

EPA United States Environmental Protection Agency Washington, DC 20460 Work Assignment						Work Assignment Number 3-05				
						<input type="checkbox"/> Other <input type="checkbox"/> Amendment Number:				
Contract Number EP-C-12-021			Contract Period 09/26/2012 To 09/25/2016			Title of Work Assignment/SF Site Name				
			Base Option Period Number 3			Eval of Industrial Discharges				
Contractor EASTERN RESEARCH GROUP, INC.					Specify Section and paragraph of Contract SOW See PWS					
Purpose: <input checked="" type="checkbox"/> Work Assignment <input type="checkbox"/> Work Assignment Close-Out <input type="checkbox"/> Work Assignment Amendment <input type="checkbox"/> Incremental Funding <input type="checkbox"/> Work Plan Approval					Period of Performance From 09/26/2015 To 09/25/2016					
Comments: Work shall not commence on this Work Assignment until September 26, 2015.										
<input type="checkbox"/> Superfund Accounting and Appropriations Data <input checked="" type="checkbox"/> Non-Superfund										
Note: To report additional accounting and appropriations data use EPA Form 1900-69A.										
SFO <input type="checkbox"/> (Max 2)										
Line	DCN (Max 6)	Budget/FY (Max 4)	Appropriation Code (Max 6)	Budget Org/Code (Max 7)	Program Element (Max 9)	Object Class (Max 4)	Amount (Dollars)	(Cents)	Site/Project (Max 8)	Cost Org/Code (Max 7)
1										
2										
3										
4										
5										
Authorized Work Assignment Ceiling										
Contract Period:		Cost/Fee:			LOE:					
09/26/2012 To 09/25/2016										
This Action:										
Total:										
Work Plan / Cost Estimate Approvals										
Contractor WP Dated:				Cost/Fee:			LOE:			
Cumulative Approved:				Cost/Fee:			LOE:			
Work Assignment Manager Name William Swietlik							Branch/Mail Code:			
_____ (Signature) (Date)							Phone Number 202-566-1129			
							FAX Number:			
Project Officer Name Meghan Hessenauer							Branch/Mail Code:			
_____ (Signature) (Date)							Phone Number: 202-566-1040			
							FAX Number:			
Other Agency Official Name							Branch/Mail Code:			
_____ (Signature) (Date)							Phone Number:			
							FAX Number:			
Contracting Official Name Brad Heath							Branch/Mail Code:			
_____ (Signature) (Date)							Phone Number: 513-487-2352			
							FAX Number:			

**Performance Work Statement
Contract EP-C-12-021
Work Assignment 3-05**

Title: Evaluating Categories of Industrial Dischargers for Potential National Regulations

Work Assignment Contracting

Officer's Representative (WACOR): William F. Swietlik

Alternate Work Assignment Contracting

Officer's Representative (Alternate WACOR): Samantha Lewis

Period of Performance (POP): September 26, 2015 through September 25, 2016

New Contracting Terminology From Environmental Protection Agency Acquisition Guide (EPAAG) Subsection 1.6.5
Contract-Level Contracting Officer's Representative (CL-COR) = Project Officer (PO)
Alternate Contract-Level Contracting Officer's Representative (Alternate CL-COR) = Alternate Project Officer (APO)
Work Assignment Contracting Officer's Representative (WACOR) = Work Assignment Manager (WAM)
Alternate Work Assignment Contracting Officer's Representative (Alternate WACOR) = Alternate Work Assignment Manager (AWAM)

Introduction:

The 1972 Clean Water Act directs EPA to develop national regulations placing limits on the pollutants that are discharged by categories of industry to rivers and streams (termed "effluent guidelines") or to sewage treatment plants¹ (termed "pretreatment standards"). The Act also directs EPA to develop national regulations for new industrial facilities (termed "new source performance standards").

An additional critical component of the Act is that it requires EPA to periodically study and review existing effluent guidelines, pretreatment standards, and standards of performance for new sources and consider the need to develop regulations for industries not covered by a national regulation. These planning requirements are found in several sections of the Clean Water Act (CWA). Section 304(m) provides for an effluent guideline plan that contains three basic elements to be published on February 4, 1987 and biennially thereafter.

First, EPA must establish a schedule for the annual review of existing effluent guidelines promulgated under Section 304(b), (i.e., limitations for existing direct dischargers) and for annual revision of the guidelines if appropriate (see Section 304(m)(1)(A)). Second, EPA must

¹Also referred to as publicly owned treatment works or POTWs.

identify categories of sources that directly discharge toxic or non-conventional pollutants for which EPA has not published effluent limitations guidelines or new source performance standards (see Section 304(m)(1)(B)). Third, EPA must set a schedule for the establishment of national regulations for any categories identified in the second step, with a final promulgated regulation three years after identification in a national plan (see Section 304(m)(1)(C)).

For indirect dischargers, Section 304(g) requires EPA to review at least annually and, if appropriate, revise the pretreatment standards EPA has promulgated under CWA Section 307. In addition, Section 307(b) provides that EPA must promulgate pretreatment standards for categories of sources not subject to existing pretreatment standards if there is pass-through or interference at POTWs. As good government practice, EPA publishes the findings of its annual reviews of direct and indirect dischargers together in one document, the “Effluent Guidelines Program Plan.” EPA publishes a preliminary Plan in odd-numbered years and publishes a final Plan in even-numbered years after public review on the preliminary Plan.

Under this work assignment, ERG will provide technical support to EPA in conducting its Section 304/307 annual review of existing effluent guidelines and standards and identifying and evaluating new sources of wastewater discharges. In addition, ERG will provide support to EPA with the following tasks:

- Develop a work plan and provide bi-monthly and monthly progress reports;
- Develop an electronic schedule compatible with Microsoft Project;
- Develop a revised annotated timeline for completing the 2015 Annual Review and guiding the 2016 Annual Review and developing the Preliminary 2016 Effluent Guidelines Program Plan and Final 2016 Plan;
- Prepare quarterly Quality Assurance reports;
- Provide technical support to EPA in evaluating industrial facilities or categories;
- Provide technical support to EPA for briefings and for public and industry outreach activities; and,
- Provide technical support to EPA for Section 304 activities, preparing and maintaining a record, and drafting support documents.

During this work assignment, ERG will provide the following deliverables to EPA:

- Work plan and cost estimate;
- Bi-monthly and monthly progress reports;
- Any necessary revisions to the existing PQAPP, if required by EPA;
- Quarterly Quality Assurance reports;
- Detailed Investigations on Specific Industries Identified by EPA;
- Analysis supporting Section 304 effluent guidelines review activities;
- Docket materials; and,
- Quick turnaround tasks.

General Work Assignment Requirements:

Deliverable Formatting and Terminology. Throughout this Work Assignment, ERG shall provide draft and final reports to EPA in electronic and hard copy formats. The WACOR and contractor will use the terminology in this work assignment to improve the deliverable review process. See Attachment A. ERG shall discuss the computer file formats to be used for word processing, spreadsheet, database and graphics with the WACOR prior to file preparation. The WACOR will identify for ERG which documents will be posted on EPA's Effluent Guidelines webpage (<http://epa.gov/guide/304m/index.html>). These documents posted to the Effluent Guidelines webpage will need to be Section 508 compliant.² For planning purposes, ERG should assume that the following documents will be posted to EPA's Effluent Guidelines webpage: (1) the Annual Review Report for the 2015 and 2016 reviews, the Preliminary 2016 Effluent Guidelines Program Plan, the Final 2016 ELG Plan, and the Index and User's Guides for the dockets for the Plans.

Travel. EPA anticipates a limited need for non-local travel by contractor employees and/or subcontractors to support the scope of this work assignment (e.g., site visits activities, attending public meetings, attending scientific/technical conferences). This may include up to five site visits for the metal finishing study. ERG will provide specific travel details and costs in a request for travel approval submitted for WACOR review and Contract-Level COR (CL-COR) signature before each trip occurs (as specified by the contract per clause H.32).

Confidential Business Information. ERG will, at all times, adhere to Confidential Business Information (CBI) procedures when handling industry information. ERG will manage all reports, documents, and other materials and all draft documents developed under this work assignment in accordance with the procedures set forth in its "Office of Science & Technology Confidential Business Information (OST-CBI) Application Security Plan," dated December 5, 2007 or its successor approved plans. See Task 9 for more details.

Identification as Contracting Staff. To avoid the perception that contractor personnel are EPA employees, contractor personnel shall be clearly identified as independent contractors of EPA when participating in events with outside parties and visiting field sites. When speaking with the public ERG should refer all interpretations of policy to the WACOR.

Limitation of Contractor Activities. ERG will submit drafts of all deliverables to the WACOR for review prior to submission of the final product. ERG will incorporate all WACOR comments into all final deliverables, unless otherwise agreed upon by the WACOR. ERG will adhere to all applicable EPA management control procedures as implemented by the EPA Contracting Officer (CO), CL-COR and WACOR.

Deliverables. Major technical reports shall be subject to internal contractor peer review by an expert(s) not directly involved in the mainstream Work Assignment tasks. Deliverables will be prepared with proper adherence to EPA style and format requirements.

² See <http://www.epa.gov/epahome/accessibility.htm>.

Deadlines. For the purpose of developing the work plan, ERG shall assume the deliverable due dates provided with each task. Most of the deadlines are associated with Agency milestones which are subject to change. Based upon past experience with the 304(m) planning process, any changes in schedule tend to result in extensions, rather than shorter schedules. In either case, if the schedule changes then the WACOR will change the deliverable deadlines through written technical direction. The WACOR may also use written technical direction to change a deadline if management requires any particular deliverable earlier than specified in the following tasks. For any deliverable, no deadline will extend beyond the WA period of performance. The following table provides a summary of the Agency milestones.

Major Milestones
Publication of the Preliminary 2016 Plan
Publication of the 2015 Annual Review Report (ARR)
Conducting the 2016 Annual Review
Publication of Final 2016 Plan
Publication of the 2016 ARR

Conferences, Meetings and Other Events: No single event under this Work Assignment is anticipated to exceed \$20,000. The Contractor shall immediately notify the CO, CL-COR and WACOR of any anticipated event involving support for a meeting, conference, workshop, symposium, retreat, seminar or training that may potentially incur \$20,000 or more in cost during performance. Conference expenses are all direct and indirect costs paid by the government and include any associated authorized travel and per diem expenses, room charges for official business, audiovisual use, light refreshments, registration fees, ground transportation and other expenses as defined by the Federal Travel Regulations. All outlays for conference preparation should be included, but the federal employee time for conference preparation should not be included. After notifying EPA of the potential to reach this threshold, the Contractor shall not proceed with the task(s) until authorized to do so by the Contracting Officer.

Tasks:

Task 1 – Program Management:

ERG shall develop a work plan describing the necessary steps and estimated hours to complete each of the tasks included in this work assignment. The work plan shall also include a list of the key personnel to participate in the work assignment. ERG shall also estimate direct costs such as travel, computer costs, typing, etc.

ERG shall provide electronic copies of the monthly progress reports to the CO, CL-COR and WACOR. Each progress report shall describe the technical work and expenditures for the same time period as the corresponding invoice. The reports shall list by task the amount of work completed and include a table of hours by personnel for each task. The reports also shall identify

any problems or difficulties.

In addition to the monthly progress reports, ERG shall prepare monthly and mid-monthly status summaries (in a Microsoft Excel compatible format) to the WACOR and CL-COR. The monthly and mid-monthly status reports shall list the following information by task: budgeted LOE for each task, summaries of current and cumulative costs and LOE expended for the reporting period. The mid-monthly and monthly summaries of costs and expenditures LOE shall be provided prior to the progress report.

ERG will prepare an annotated timeline for completing the Preliminary 2016 Plan, the 2015 ARR and for preparing the 2016 ARR and the Final 2016 Effluent Guidelines Program Plan and conducting the 2016 annual review. This annotated timeline will describe the major elements of developing these materials or conducting these investigations from beginning to end and their timing and LOE. The WACOR will use the timeline to identify all major project tasks, track the project's progress, and coordinate all aspects of the project. ERG will update and revise the annotated timeline as needed. The timeline will be used by EPA to help get the 304m planning process back on statutory schedule.

TASK 1 – DELIVERABLES	
Deliverable	Deadline
Work Plan	• In accordance with contract requirements
Progress Reports	• Monthly
Mid-Monthly Reports	• Mid-monthly and monthly
1 st Draft - Draft Annotated Timeline	• 45 days from issuance of work assignment
2 nd Draft - Draft Annotated Timeline	• 14 days from receipt of WACOR comments
1 st Draft - Electronic Schedule (compatible with MS Project)	• 45 days from issuance of work assignment
2 nd Draft - Electronic Schedule (compatible with MS Project)	• 14 days from receipt of WACOR comments

Task 2 – Quality Assurance:

Task 2: Quality Assurance

2.1 Background

Quality Assurance Project Plans are required under the Agency's Quality Assurance Policy CIO-2105, formerly EPA Order 5360.1 A2 (May 2000), and implementing guidance CIO-2105-P-01-0 (May 2000). All projects that involve the generation, collection, analysis, and use of environmental data must have an approved Quality Assurance Project Plan (QAPP) in place prior to the commencement of the work. This includes both newly generated environmental data as well as that which is already existing. Examples of these environmental data operations are provided in Table 1-1 below.

Table 1-1. Examples of work that involves the collection, generation, evaluation, analysis, or use of environmental data

Item	Examples
Data	Includes field sampling information (sample location information, flow measurements, temperature, pH, physical observations, etc.), laboratory measurements (e.g., chemical, physical, biological, radiological measurements), data collected from questionnaires, economic data, census data, and any other types of existing data (i.e., data generated for a different purpose or generated by a different organization)
Data generation	Includes field studies, laboratory studies, and generation of modeling output
Data collection	Includes field surveys, questionnaire surveys, literature searches, and third party data
Data evaluation	Includes data inspection, review, assessment, and validation
Data analysis	Includes statistical, engineering, and economic analysis, and testing, evaluation, and validation of methods and models; database creation, data extraction, and data manipulation
Data Use	Any use of data to support EPA decisions, regulations, policy, publications, or tools (including effluent guidelines, 304(m) program, standards, environmental assessments, and models, tools, or reports disseminated by EPA to assist other organizations in implementing environmental programs)

QAPPs are required for the development or revision of models and software that support the generation, collection, evaluation, analysis, or use of data. (A model is set of equations and assumptions used to predict unknown data.) When existing models are used as a tool to generate or evaluate data, the project QAPP must describe the model and explain how it will be used and how its output will be evaluated to ensure the modeling effort meets the overall quality objectives for the project. Development or revision of new models also must be supported by a QAPP that describes the objectives for the model, the quality criteria that will be applied to the model, and the procedures for evaluating whether the model meets those criteria.

2.2 QA Project Plan Requirements

The Contractor has previously prepared a contract-wide Programmatic QAPP (PQAPP) for Contract EP-C-12-021. This PQAPP describes, in a single document, information that is not site or time-specific, but applies throughout the program (i.e., the duration of the contract). When tasked with preparing the PQAPP, the Contractor was informed that the PQAPP may need to be supplemented with project-specific details to support individual work assignments that involve the collection, generation, evaluation, analysis, or use of environmental data for which the PQAPP may not be applicable. As a result, the Contractor prepared a Supplemental QAPP (SQAPP) specific to the IWTT Project described in Task 8. Both the PQAPP and SQAPP have been approved by EPA and cover all activities envisioned under this work assignment.). EPA has determined that the Contractor will continue operating under the existing PQAPP and SQAPP and that these two documents address the QA requirements for this work assignment. Table 1-2 at the end of this Task demonstrates how the PQAPP/SQAPP address QA requirements for this work assignment.

The activities in this work assignment involve gathering, evaluating, analyzing, and otherwise using existing environmental data (also known as “secondary data”). In support of this work assignment, the Contractor shall ensure that the work plan provides enough detail to clearly describe:

- Specific objectives of the project(s) supported by this work assignment, including typical questions that must be answered when collecting and analyzing existing data to support the development of EPA's biennial 304m plan.
- The type of data to be gathered or used under this work assignment to support the project objectives—including data from search engines, federal databases, EPA databases—as a well as a rationale for when those databases are appropriate and what data available in each will support the project
- The quality objectives needed to ensure the data will support the project objectives, and
- The QA/QC activities to be performed to ensure that any results obtained are documented and are of the type, quality, transparency, and reproducibility needed.

2.3 Additional QA Documentation Required

The EPA Quality Manual for Environmental Programs (CIO 2105-P-01-0, May 2000) requires published Agency reports containing environmental data to be accompanied by a readily identifiable section or appendix that discusses the quality of the data and any limitations on the use of the data with respect to their originally intended application. The EPA Quality Manual further requires Agency reports to be reviewed by the QA manager (or other authorized official) before publication to ensure that an adequate discussion of QA and QC activities is included. The purpose of the review is to ensure the reports provide enough information to enable a knowledgeable reader to determine if the technical and quality goals were met for the intended use of the data. Reports should include applicable statements regarding the use of any environmental data presented as a caution about possible misuse of the data for other purposes. For example, a Technical Support Document or Study Report must include a clear discussion of the quality management strategies (including the project goals and objectives, quality objectives and criteria, and QA/QC practices) that were employed to control and document the quality of data generated and used. These documents should also discuss any deviations from procedures documented in the EPA-approved QAPP(s) supporting the project, the reasons for those deviations, any impact of those deviations had on data quality, and steps taken to mitigate data quality issues.

In support of this Agency requirement, all major deliverables (e.g., Technical Support Documents, Study Reports, Analytical Methods) produced by the Contractor under this work assignment must include a discussion of the QA/QC activities that were performed to support the deliverable, and this discussion must provide a sufficient level of detail to allow the EAD QA Coordinator (or designee) to determine if the QA/QC strategies implemented for the project sufficiently support the intended use of the data.

The Contractor also shall provide EPA with monthly reports of QA activities performed during implementation of this work assignment. These monthly QA reports shall identify QA activities performed to support implementation of this work assignment, problems encountered, deviations from the QAPP, and corrective actions taken. If desired, the Contractor may include this as a part of the contract-required monthly financial/technical progress report.

2.4 Data Quality Act/Information Quality Guidelines Requirements

The Data Quality Act (also known as the Information Quality Act) requires EPA to ensure that influential information disseminated by the Agency is sufficiently transparent in terms of data and methods of analysis that the information is capable of being substantially reproduced. To support compliance with these data transparency/ data reproducibility requirements, EPA plans to include QAPPs as part of any rulemaking record documentation to be made available to the public. (This includes PQAPPs and SQAPPs.) The Contractor may claim information in QAPPs as confidential; if the Contractor chooses to do so, the Contractor shall submit a public version and a confidential version at the time the QAPP is submitted for approval by EPA. The public version shall be included in the public docket for the applicable rulemaking (or other docket record), and the confidential version shall be included in a non-public (i.e., confidential) portion of the docket (or record).

Information contained in the approved QAPP shall be transparent and reproducible and meet the requirements of the Data Quality Act for influential information. EPA's *Guidelines for Ensuring and Maximizing the Quality, Objectivity, Utility, and Integrity, of Information Disseminated by the Environmental Protection Agency* (EPA/260R-02-008, October 2002), referred to as "EPA's Information Quality Guidelines," describe EPA procedures for meeting Data Quality Act requirements. Section 6.3 of EPA's Information Quality Guidelines indicate that "especially rigorous robustness checks" should be applied in circumstances where quality-related information cannot be disclosed due to confidentiality issues. Where applicable, the Contractors should indicate which results were obtained using the tools (SOPs, checklists, and guidelines) that the Contractor designates as confidential so that the WACOR can easily identify the areas that shall require rigorous robustness checks and document that those checks have been performed. At the discretion of the WACOR through technical directives, the Contractors may be requested to prepare pre-dissemination review checklists as described in Section 5.5 of the Office of Water - Quality Management Plan, February 2009.

EP-C-12-021, 2016 Work Assignment 3-05: QA CHECKLIST-- Justification for Use of an Existing PQAPP for the Quality Documentation for Projects that Rely on Existing Data

QAPP Element		Sufficiently Addressed in PQAPP	Not Applicable to Project	Explanatory Comments
A1. Title & Approval Sheet				
Project title		X		
Organization's name		X		
Effective date and/or version identifier		X		
Dated signature of Organization's project manager		X		
Dated signature of Organization's QA manager		X		
Other signatures, as needed (e.g., EAD Project Officer, EAD QA Coordinator)		X		
Revision History		X		
A2. Table of Contents				
Includes sections, figures, tables, references, and appendices		X		
Document control information indicated (when required by the EPA Project Manager and QA Manager)		X		
A3. Distribution List				
Includes all individuals who are to implement or otherwise receive the QAPP and identifies their organization		X		
A4. Project/Task Organization				
Identifies key individuals with their responsibilities (e.g., data users, decision makers, project QA manager, Subcontractors, etc.) and contact info.		X		
Organization chart shows lines of authority & reporting responsibilities		X		
Project QA manager position indicates independence from unit collecting/using data		X		
A5. Problem Definition/Background				
Clearly states problem to be resolved, decision to be made, or hypothesis to be tested		X		
Identifies project objectives or goals		X		
Historical & background information		X		
Cites applicable technical, regulatory, or program-specific quality standards, criteria, or objectives		X		
A6. Project/Task Description				
List measurements to be made/data to obtain			X	
Notes special personnel or equipment requirements			X	
Provides work schedule			X	
A7. Overall Quality Objectives & Criteria				
States overall quality objectives and limits needed to support the project goals and objectives cited in A5		X		

QAPP Element		Sufficiently Addressed in PQAPP	Not Applicable to Project	Explanatory Comments
A8. Special Training Requirements/ Certifications				
Identifies specialized skills, training or certification requirements			X	
Discusses how this training will be provided/the necessary skills will be assured and documented			X	
A9. Project-level Documents & Records				
Describes process for distributing the approved QAPP and other planning documents (and updates) to staff		X		
Identifies final work products that will result from the project		X		
Describes the process for developing, reviewing, approving, and disseminating the final work products and individuals responsible for these processes		X		
B1. Data Needs				
Detailed list/description of the specific data elements needed to support project goals		X		For IWTT SQAPP applies
Description of the scope of the data elements that you need (e.g., data supporting specific treatment options vs. the full range of options, data supporting the entire country vs. a specific geographic region)		X		For IWTT SQAPP applies
If project includes development or update of a project database, QAPP identifies and defines each database field		X		For IWTT SQAPP applies
B2. Potential Data Sources				
Identifies and describes potential sources of the existing data needed (e.g., photographs, topographical maps, facility or state files, census data, meteorological data, publications, etc.) and the rationale for their use		X		For IWTT SQAPP applies
If literature searches are used, describes the search engines that will be used and key search terms		X		
If databases or models will be used, describe the database (or model) in terms of who developed it and operates it and the type of data it contains		X		For IWTT SQAPP applies
For other potential sources, describe the potential sources & rationale for considering or using each one		X		For IWTT SQAPP applies

QAPP Element		Sufficiently Addressed in PQAPP	Not Applicable to Project	Explanatory Comments
B3. Criteria for Selecting Data Sources				
Identifies each criterion that will be used to determine if the candidate data sources listed in B2 will meet your needs, and how each criterion is defined. (Criteria vary by project; examples include reliability, age, applicability, quantity, format, and others)		X		For IWTT SQAPP applies
Explains rating system used to evaluate source against each criterion		X		
B4. Data Value Selection Approach				
For data sources that meet the criteria identified in B3: Describes the criteria and procedures that will be used to determine which value(s) identified in the acceptable sources are most appropriate for use in the project		X		For IWTT SQAPP applies
For data that do not meet these pre-established criteria but are the only data available, explains how the decision to use such data will be made and documented		X		For IWTT SQAPP applies
B5. Resolving Data Gaps				
Describes the process for identifying and addressing data gaps that still exist after candidate data sources have been evaluated and appropriate data values have been identified		X		
Describes the process that will be used to address any new data needs revealed during the data gathering process (i.e., additional data elements not previously considered)		X		
B6. Data Gathering Documentation and Records				
Describes how results of the source selection and the data value selection will be documented, including any sources or values that were rejected and the rationale for not using them		X		For IWTT SQAPP applies
For data that are deemed acceptable and that will be used, explains how each data element will be associated to its original source citation (i.e., bibliographic information, telephone contact reports, email messages, etc.)		X		For IWTT SQAPP applies
C1. Standardization of Data Elements				
Describes the process to ensure that units and other key measures are captured and standardized (or otherwise made comparable) in the database		X		

QAPP Element		Sufficiently Addressed in PQAPP	Not Applicable to Project	Explanatory Comments
If the project requires that all fields be standardized to a single set of units (e.g., US dollars for economic data, µg/L for chemical data), identifies the standard units that will be required for each data element		X		
Identifies the procedures for converting data reported in other units to the standardized units, including any rounding or truncating procedures, and procedures for ensuring these conversions are performed correctly		X		
If standardization of data elements is not needed, explains the process for ensuring that data presented in varying units are comparable enough for use in the project and that project staff members and other data users will be able to readily identify differences in units		X		
C2. Data Entry				
Explains the process for manually entering selected data into the project database, who will be responsible for such data entry, and the QC strategies that will be used to ensure that the database accurately and completely captures the data as presented in the original source		X		For IWTT SQAPP applies
C3. Merging or Uploading Electronic Data from Existing Sources				
If data are available electronically and will be uploaded or merged into the project database: describes the procedures that will be followed to ensure that errors are not introduced during the upload/merge process and that the final database reflects the original dataset(s)		X		For IWTT SQAPP applies
C4. Data Review				
Describes the process for ensuring that the data have been recorded, transmitted, and processed correctly		X		For IWTT SQAPP applies
C5. Data Storage and Manipulation				
Describes how the existing data will be stored		X		For IWTT SQAPP applies
Describes who will be responsible for access to and maintenance of the stored data		X		For IWTT SQAPP applies
Describes how the existing data will be incorporated with other project data to support the project goal/decision to be made		X		For IWTT SQAPP applies

QAPP Element		Sufficiently Addressed in PQAPP	Not Applicable to Project	Explanatory Comments
Describes the QC strategies that will be employed to ensure that the integrity of the data is not compromised during data storage, access/retrieval, updates, or other manipulation		X		For IWTT SQAPP applies
D1. Data Quality Verification and Data Quality Reporting				
Describes the process for verifying that the final set of data meets the overall criteria originally specified for the project		X		For IWTT SQAPP applies
Describes how these determinations will be documented and reported		X		For IWTT SQAPP applies
For data that don't meet the pre-established specifications, explains the process for determining if they are usable and how such decisions will be documented		X		For IWTT SQAPP applies
D2. Use/Analysis of the Existing Data				
Provides details regarding the exact means in which the data will be used to meet project objectives		X		For IWTT SQAPP applies
Includes an explanation or list of the information to be calculated and the data elements that will be used to make those calculations		X		For IWTT SQAPP applies
Includes applicable calculations and equations (if known) or explanations of how they will be developed		X		For IWTT SQAPP applies
Includes plans for excluding outliers				
D3. Methodology Documentation and Conceptual Review				
If exact methodologies for analyzing the data will need to be developed or modified during the course of data analysis, explains the process by which such methodologies will be documented, who is responsible for reviewing/ approving their use, and how the methodologies will be checked to ensure they yield the desired products		X		For IWTT SQAPP applies
D4. Technical Review of the Data Analysis				
Describes activities that will be used to ensure the data analyses are being implemented as specified and will support project objectives		X		For IWTT SQAPP applies
Explains procedures for identifying and notifying appropriate personnel if changes to the originally planned procedures are warranted, and the process for approving, documenting and implementing such changes		X		For IWTT SQAPP applies

QAPP Element		Sufficiently Addressed in PQAPP	Not Applicable to Project	Explanatory Comments
D5. Final Verification of Data Analysis and Reconciliation with User Requirements				
Describes the process for reviewing the final work product to ensure that the work was generated in accordance with the QAPP, and that the work product addresses the overall project goals and objectives		X		For IWTT SQAPP applies
Describes how the results of this assessment will be documented		X		For IWTT SQAPP applies
Describes how any limitations of the data or data analyses that were used to prepare the final work product will be documented and communicated		X		For IWTT SQAPP applies

Deliverables and schedule under Task 2

TASK 2 – DELIVERABLES	
Deliverable	Deadline
SQAPP	• 10 days after notification by the WACOR and or QAC that an SQAPP is needed.
Revisions based on EPA feedback	• 7 days after receipt of EPA feedback.
Final SQAPP for this Work Assignment	• 5 days after EPA feedback
PQAPP/SQAPP progress reports	• Monthly

Task 3 – Completion of 2015 Annual Review Report (ARR):

ERG shall support EPA in completing the 2015 304m Annual Review Report (ARR). ERG shall complete the preparation of all necessary supporting documentation, data and information for the 2015 ARR. ERG shall provide support in writing, formatting, proofing, editing and reviewing the draft report to create a final report. ERG shall provide support for the publication, web posting and possible sharing of information in public meetings and other outreach efforts, including 508 formatting of all necessary documents.

ERG shall also finish assembling all information for the public and confidential records for the 2015 annual review. ERG shall coordinate with the Office of Water Docket office to ensure the record will meet the docket's requirements including any Federal Docket Management System (FDMS) requirements.

TASK 3– DELIVERABLES	
Deliverable	Date
Complete the 2015 Annual Review Report (ARR)	• According to a schedule developed by ERG and approved by the WACOR.
Provide the WACOR with a final draft of the 2015 ARR	• According to a schedule developed by ERG and approved by the WACOR.
Respond to comments and necessary revisions to the document	• Within 10 working days after being provided by the WACOR.
Provide the Final 2015 Annual Review Report	• According to a schedule developed by ERG and approved by the WACOR.

Task 4 -- Preparation and Publication of the Preliminary 2016 Final Plan:

ERG shall support EPA in writing and completing the Preliminary 2016 ELG Plan. ERG shall complete the preparation of all necessary supporting documentation, data and information for the Preliminary 2016 Plan. ERG shall provide support in writing, formatting, proofing, editing and reviewing and revising the draft Plan. ERG shall provide support for the publication, web posting and possible sharing of information in public meetings and other outreach efforts about the Plan. ERG shall provide all necessary support to compile, address and respond to all public comments on the Preliminary 2016 Plan.

ERG shall also finish assembling all information for the public and confidential records for the Preliminary 2016 Plan. ERG shall coordinate with the Office of Water Docket office to ensure the record will meet the docket's requirements including any FDMS requirements.

TASK 4– DELIVERABLES	
Deliverable	Date
Draft the Prelim. 2016 ELG Plan	• According to a schedule developed by ERG and approved by the WACOR.
Provide the WACOR with a draft of the Prelim. Plan	• According to a schedule developed by ERG and approved by the WACOR.
Compile, address and respond to all public comments from the Preliminary 2016 Plan	• According to a schedule developed by ERG and approved by the WACOR.
Respond to WACOR/reviewer comments and necessary revisions to the document	• Within 10 working days after being provided by the WACOR.

Task 5 – Conduct the 2016 Annual Review and Preparation of the 2016 Annual Review Report (ARR):

ERG shall support EPA in completing the 2016 304m annual review and in preparation of the 2016 Annual Review Report (ARR). The 2016 annual review is to be completed using methods and approaches agreed upon by the WACOR. ERG shall complete the preparation of all necessary supporting documentation, data and information for the 2016 annual review and the ARR. ERG shall provide support in writing, formatting, proofing, editing and reviewing the

draft report to create a final report. ERG shall provide support for the publication, web posting and possible sharing of information in public meetings and other outreach efforts, including 508 formatting of all necessary documents.

ERG shall also finish assembling all information for the public and confidential records for the 2016 review. ERG shall coordinate with the Office of Water Docket office to ensure the record will meet the docket's requirements including any FDMS requirements.

TASK 5– DELIVERABLES	
Deliverable	Date
Complete the 2016 Annual Review Report (ARR)	• According to a schedule developed by ERG and approved by the WACOR.
Provide the WACOR with a final draft of the 2016 ARR	• According to a schedule developed by ERG and approved by the WACOR.
Respond to comments and necessary revisions to the document	• Within 10 working days after being provided by the WACOR.
Provide the Final 2016 Annual Review Report	• According to a schedule developed by ERG and approved by the WACOR.

Task 6 - Preparation and Publication of the Final 2016 Plan:

ERG shall support EPA in preparing the Final 2016 ELG Plan. ERG shall complete the preparation of all necessary supporting documentation, data and information for the Final 2016 Plan. ERG shall provide support in writing, formatting, proofing, editing and reviewing and revising the draft Plan. ERG shall provide support for the publication, web posting and possible sharing of information in public meetings and other outreach efforts about the Plan, including 508 formatting of all necessary documents.

ERG shall also assemble all information for the public and confidential records for the Final 2016 Plan. ERG shall coordinate with the Office of Water Docket office to ensure the record will meet the docket's requirements including any FMDS requirements.

TASK 6– DELIVERABLES	
Deliverable	Date
Draft the Final 2016 ELG Plan	• According to a schedule developed by ERG and approved by the WACOR.
Provide the WACOR with a draft of the Final 2016 Plan	• According to a schedule developed by ERG and approved by the WACOR.
Respond to WACOR/reviewer comments and necessary revisions to the Final 2016 Plan	• Within 10 working days after being provided by the WACOR.
Provide the final draft of the Final 2016 ELG Plan ready for publication	• According to a schedule developed by ERG and approved by the WACOR.

Task 7 – Conduct and Prepare Other Studies and Investigations as Needed.

ERG shall provide support for the implementation of existing and potentially revised effluent guidelines rulemakings, including preliminary category reviews, Preliminary Studies and other investigations of industry discharges as needed and identified by EPA and from the annual reviews. Specifically, ERG will continue with the study of the Metal Finishing industry. The Metal Finishing study will entail conducting up to 10 site visits to metal finishing plants to gather information and knowledge about the metal finishing processes and operations. For planning purposes, ERG shall assume these site visits will be to two or more facilities in the following geographic regions; California, Mid-west, Southwest, and East Coast. For other investigation planning purposes ERG should assume five investigations and other studies will be necessary during the performance period. ERG shall also support other ongoing investigations such as nanomaterials, pesticides, the DMR/TRI Comparison, the review of international TRI databases (Canada, Mexico), TSCA Work Plan Chemicals, the EDF report, MA TURA, and ChemView, as directed by the WACOR.

TASK 7– DELIVERABLES	
Deliverable	Date
Draft of study report and other documents for Metal Finishing	• According to a schedule developed by ERG and approved by the WACOR.
Drafts of other studies and investigations as needed.	According to a schedule developed by ERG and approved by the WACOR.
Final study report and other documentation for Metal Finishing	• According to a schedule developed by ERG and approved by the WACOR.
Final reports/memos for other studies and investigations	• According to a schedule developed by ERG and approved by the WACOR.

Task 8 – Industrial Wastewater Treatment Technology (IWTT) and Historic ELG Access (HELGA) Databases

ERG shall provide technical support for the continued development and ongoing implementation of databases for the support of 304m planning and ELG implementation, including the IWTT Database and the HELGA Database. Specifically, ERG will help with the preparation of the databases where necessary, coordinate with other contractors, share data and information for populating the databases, support ongoing collection of data and information to go into the databases, and assist with public outreach and communication as directed by the WACOR.

TASK 8– DELIVERABLES	
Deliverable	Date
Ongoing population of IWTT	Ongoing, with Technical Direction from WACOR
Completion of IWTT database reports and formats	According to a schedule developed by ERG and approved by the WACOR

TASK 8– DELIVERABLES	
Preparing the IWT Database for public access	According to a schedule developed by ERG and approved by the WACOR
Developing the HELGA Database	According to a schedule developed by ERG and approved by the WACOR

Task 9 – General Effluent Guidelines Implementation Support and Technical Support:

ERG shall provide technical support for the implementation of existing effluent guidelines rulemakings. Specifically, ERG will help with the preparation of guidance documents supporting the implementation of the existing effluent guidelines. For planning purposes ERG should assume eight (8) technical memos supporting existing effluent guidelines. Preparation of these eight (8) technical memos will likely involve the review of current permits and fact sheets, DMR data, and other facility specific information.

ERG will provide technical support to the EPA in responding to inquiries from other EPA offices, stakeholders, and permitting authorities in implementing existing effluent guidelines. For planning purposes ERG should assume twelve (12) requests of varying effort will be required by EPA during the period of performance.

ERG will prepare materials identified by the WACOR through written technical direction to support Agency briefings as well as EPA's 304(m) outreach activities to the public and to industry. These materials may include presentations, reports, brochures, leaflets, and posters.

ERG shall provide supporting information for briefings and support on FOIAs (i.e. locating and supplying the WACOR or CL-COR with relevant information to be used in the Agency's response to the FOIA) as directed in writing by the WACOR or CL-COR. For purposes of the workplan, ERG shall assume that it will support three FOIA requests and three briefings.

ERG may be required to attend outreach activities or ship materials on a case-by-case basis as required by the WACOR's technical direction. ERG will submit detailed plans and approaches upon receipt of technical direction from the WACOR. ERG will submit materials to EPA for review and approval prior to their implementation. When conducting outreach activities, ERG personnel will clearly identify themselves as contractor employees both orally and via the use of identification badges. Typically ERG will be required to provide products within two weeks or less.

TASK 9 – DELIVERABLES	
Deliverables	Deadline
Eight Technical Memos Supporting Existing Effluent Guidelines	• By written technical direction.
Twelve (12) Technical Support Actions For EPA Offices, Stakeholders, And Permitting Authorities In Implementing Existing Effluent Guidelines	• By written technical direction.
Presentations, Reports, Brochures, Leaflets, And Posters	• By written technical direction.

TASK 9 – DELIVERABLES	
Briefing / FOIA Support	• Requests to be supplied within 14 days

Task 10- CBI Procedures:

During the course of the work assignment, ERG will be accessing and evaluating CBI. As such, ERG shall adhere to EPA's CBI policy and procedures as described in the contract statement of work, Section 1.2. ERG must maintain CBI security clearance to use CBI information (Refer to Section H of the schedule for security requirements and 70 FR 9070; February 24, 2005). ERG will not disclose any CBI to anyone other than EPA without prior written approval from the WACOR. ERG shall utilize CBI information in accordance with contract requirements and limitations to include using the “Office of Science & Technology Confidential Business Information (OST-CBI) Application Security Plan,” dated August 1, 2011 or its successor approved plans.

TASK 10 – DELIVERABLES	
Deliverable	Deadline
A CBI program in compliance with the requirements of the contract and the requirements of ERG’s CBI Plan.	• Ongoing

Task 11. – EJScreen:

ERG will prepare the final paper explaining the enhanced Water Indicators. ERG will also provide ongoing support for briefing OW management, OEI and OEJ to ensure the new water indicators are acceptable and function. ERG shall assist EPA in making revisions to the new indicators given EPA feedback and then develop the final water indicators for EJScreen. ERG will also provide technical support to EPA at workgroup meetings and provide support to assist EPA in implementing the new water indicators into EJScreen and supporting any public information dissemination.

TASK 11 – DELIVERABLES	
Deliverable	Deadline
Prepare the final paper explaining the enhanced Water Indicators	According to a schedule developed by ERG and approved by the WACOR.
Provide ongoing support for briefing OW management, OEI and OEJ	According to a schedule developed by ERG and approved by the WACOR.
Assist EPA in making revisions to the new indicators given EPA feedback	According to a schedule developed by ERG and approved by the WACOR.
Develop final Water Indicators for EJScreen	According to a schedule developed by ERG and approved by the WACOR.
Technical support to EPA at workgroup meetings	Ongoing

Task 12. – Records Management:

This task requires ERG to continue and complete the records management work started under the previous work assignment. As EAD's prime technical contractor for many years, the Contractor has stored and managed confidential (CBI) and nonconfidential (non-CBI) records for numerous rulemakings and other EAD activities. After conducting reviews in 2012 and 2014, the Contractor reported possessing records for, among others, the following (docket numbers included, if appropriate):

Concentrated Animal Feeding Operations (CAFOs): EPA-HQ-OW-2002-0025 and EPA-HQ-OW-2005-0037

Coal Mining (Western Remining): W-99-13

Coastal Oil and Gas

Pharmaceutical Manufacturing: OW-2003-007, plus a 09/1998 rule for which there was no docket number

POTW Study

Synthetic-based Drilling Fluids

Airport Deicing: EPA-HQ-2004-0038

Iron and Steel: W-00-25 II and EPA-OW-2002-0027

Pulp and Paper: no docket numbers for 04/1998 rule or 08/1998 amendment

Alaska Cruise Ships

Metal Products and Machinery Project File

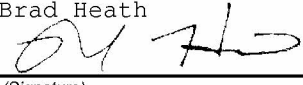
Since the dockets above are now inactive, it is appropriate to properly archive those records which should be preserved and to destroy those records for which EAD no longer has any need of retention. As a general matter, EAD tasks the Contractor with disposal of any non-CBI found in the records listed above. The only non-CBI records that may be retained, at EAD's direction, are those which may be used to assemble future historic ELG databases. Such records are most likely found in the CAFOs, Coastal Oil and Gas, POTW Study, Airport Deicing, Iron and Steel, and Pulp and Paper records.

Any CBI in the records above will be handled one of two ways: either destruction or preparation for transfer to the Federal Records Center (FRC). Any CBI non-docket items shall be destroyed, with their CBI cover sheets retained and delivered to EAD if the CBI passed through EAD. CBI docket items, on the other hand, will be prepared for delivery to the FRC, on a docket-by-docket basis. The Contractor will prepare indices in MS Word and Adobe Acrobat formats for each box of such CBI records. Once completed, the Contractor will arrange for delivery of the boxes to EAD.

EAD is also aware that the Contractor already possesses records for the Pharmaceutical Manufacturing Industry which have previously acceded to the FRC. Since it has also identified those records as currently inactive, the Contractor shall return those boxes to EAD so that they can be returned to the FRC.

TASK 12 – DELIVERABLES	
Deliverable	Deadline
Continued Disposal of non-CBI	According to a schedule developed by ERG and approved by the WACOR
Continued Destruction of CBI non-records	According to a schedule developed by ERG and approved by the WACOR
Continue Boxing and Delivery of CBI records to EAD, properly boxed and indexed	According to a schedule developed by ERG and approved by the WACOR

EPA United States Environmental Protection Agency Washington, DC 20460 Work Assignment						Work Assignment Number 3-05				
						<input type="checkbox"/> Other <input checked="" type="checkbox"/> Amendment Number: 000001				
Contract Number EP-C-12-021			Contract Period 09/26/2012 To 09/25/2016			Title of Work Assignment/SF Site Name				
			Base Option Period Number 3			Eval of Industrial Discharges				
Contractor EASTERN RESEARCH GROUP, INC.					Specify Section and paragraph of Contract SOW N/A					
Purpose: <input type="checkbox"/> Work Assignment <input type="checkbox"/> Work Assignment Close-Out <input checked="" type="checkbox"/> Work Assignment Amendment <input type="checkbox"/> Incremental Funding <input type="checkbox"/> Work Plan Approval					Period of Performance From 09/26/2015 To 09/25/2016					
Comments: The purpose of this Amendment 1 is to create a FedConnect portal in order to receive a work plan due to an error on the original work assignment transmission.										
<input type="checkbox"/> Superfund Accounting and Appropriations Data <input checked="" type="checkbox"/> Non-Superfund										
Note: To report additional accounting and appropriations data use EPA Form 1900-69A.										
SFO (Max 2) <input type="checkbox"/>										
Line	DCN (Max 6)	Budget/FY (Max 4)	Appropriation Code (Max 6)	Budget Org/Code (Max 7)	Program Element (Max 9)	Object Class (Max 4)	Amount (Dollars)	(Cents)	Site/Project (Max 8)	Cost Org/Code (Max 7)
1										
2										
3										
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5										
Authorized Work Assignment Ceiling										
Contract Period:		Cost/Fee:			LOE:					
09/26/2012 To 09/25/2016										
This Action:										
Total:										
Work Plan / Cost Estimate Approvals										
Contractor WP Dated:				Cost/Fee:			LOE:			
Cumulative Approved:				Cost/Fee:			LOE:			
Work Assignment Manager Name William Swietlik							Branch/Mail Code:			
_____ (Signature) (Date)							Phone Number 202-566-1129			
							FAX Number:			
Project Officer Name Meghan Hessenauer							Branch/Mail Code:			
_____ (Signature) (Date)							Phone Number: 202-566-1040			
							FAX Number:			
Other Agency Official Name							Branch/Mail Code:			
_____ (Signature) (Date)							Phone Number:			
							FAX Number:			
Contracting Official Name Brad Heath							Branch/Mail Code:			
_____ (Signature) (Date)							Phone Number: 513-487-2352			
							FAX Number:			

EPA United States Environmental Protection Agency Washington, DC 20460 Work Assignment						Work Assignment Number 3-05				
						<input type="checkbox"/> Other <input checked="" type="checkbox"/> Amendment Number: 000001				
Contract Number EP-C-12-021			Contract Period 09/26/2012 To 09/25/2016 Base Option Period Number 3			Title of Work Assignment/SF Site Name Eval of Industrial Discharges				
Contractor EASTERN RESEARCH GROUP, INC.					Specify Section and paragraph of Contract SOW N/A					
Purpose: <input type="checkbox"/> Work Assignment <input type="checkbox"/> Work Assignment Close-Out <input checked="" type="checkbox"/> Work Assignment Amendment <input type="checkbox"/> Incremental Funding <input type="checkbox"/> Work Plan Approval						Period of Performance From 09/26/2015 To 09/25/2016				
Comments: The purpose of this Amendment 1 is to create a FedConnect portal in order to receive a work plan due to an error on the original work assignment transmission.										
<input type="checkbox"/> Superfund Accounting and Appropriations Data <input checked="" type="checkbox"/> Non-Superfund										
Note: To report additional accounting and appropriations data use EPA Form 1900-69A.										
SFO (Max 2) <input type="checkbox"/>										
Line	DCN (Max 6)	Budget/FY (Max 4)	Appropriation Code (Max 6)	Budget Org/Code (Max 7)	Program Element (Max 9)	Object Class (Max 4)	Amount (Dollars)	(Cents)	Site/Project (Max 8)	Cost Org/Code (Max 7)
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3										
4										
5										
Authorized Work Assignment Ceiling										
Contract Period:		Cost/Fee:				LOE:				
09/26/2012 To 09/25/2016										
This Action:										
Total:										
Work Plan / Cost Estimate Approvals										
Contractor WP Dated:				Cost/Fee:			LOE:			
Cumulative Approved:				Cost/Fee:			LOE:			
Work Assignment Manager Name William Swietlik <div style="display: flex; justify-content: space-between;"> <div>_____ (Signature)</div> <div>_____ (Date)</div> </div>							Branch/Mail Code: Phone Number 202-566-1129 FAX Number:			
Project Officer Name Meghan Hessenauer <div style="display: flex; justify-content: space-between;"> <div>_____ (Signature)</div> <div>_____ (Date)</div> </div>							Branch/Mail Code: Phone Number: 202-566-1040 FAX Number:			
Other Agency Official Name <div style="display: flex; justify-content: space-between;"> <div>_____ (Signature)</div> <div>_____ (Date)</div> </div>							Branch/Mail Code: Phone Number: FAX Number:			
Contracting Official Name Brad Heath <div style="display: flex; justify-content: space-between;"> <div>  (Signature) </div> <div>9/18/2015 (Date)</div> </div>							Branch/Mail Code: Phone Number: 513-487-2352 FAX Number:			

<div style="display: flex; justify-content: space-between; align-items: center;"> <div style="text-align: center;"> </div> <div> United States Environmental Protection Agency Washington, DC 20460 </div> </div> <div style="text-align: center; margin-top: 10px;"> <h2 style="margin: 0;">Work Assignment</h2> </div>		Work Assignment Number <div style="border: 1px solid black; padding: 2px;">3-05</div>								
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Contract Number <div style="border: 1px solid black; padding: 2px;">EP-C-12-021</div>		Contract Period 09/26/2012 To 09/25/2016 <div style="display: flex; justify-content: space-between; margin-top: 5px;"> Base Option Period Number 3 </div>								
Contractor <div style="border: 1px solid black; padding: 2px;">EASTERN RESEARCH GROUP, INC.</div>		Title of Work Assignment/SF Site Name <div style="border: 1px solid black; padding: 2px;">Eval of Industrial Discharges</div>								
Purpose: <div style="display: flex; justify-content: space-between; margin-top: 5px;"> <div> <input type="checkbox"/> Work Assignment <input checked="" type="checkbox"/> Work Assignment Amendment <input type="checkbox"/> Work Plan Approval </div> <div> <input type="checkbox"/> Work Assignment Close-Out <input type="checkbox"/> Incremental Funding </div> </div>		Period of Performance <div style="margin-top: 10px;">From 10/30/2015 To 09/25/2016</div>								
Comments: <div style="border: 1px solid black; padding: 5px; min-height: 40px;"> The purpose of this Amendment 2 is to create a FedConnect portal in order to receive a work plan due to an error on the original work assignment transmission. </div>										
<div style="display: flex; justify-content: space-between; align-items: center;"> <input type="checkbox"/> Superfund <div style="flex-grow: 1; text-align: center;">Accounting and Appropriations Data</div> <input checked="" type="checkbox"/> Non-Superfund </div>										
<div style="display: flex; justify-content: space-between; align-items: center;"> <div> SFO (Max 2) <div style="border: 1px solid black; width: 30px; height: 20px; display: flex; align-items: center; justify-content: center;"> </div> </div> <div> Note: To report additional accounting and appropriations date use EPA Form 1900-69A. </div> </div>										
Line	DCN (Max 6)	Budget/FY (Max 4)	Appropriation Code (Max 6)	Budget Org/Code (Max 7)	Program Element (Max 9)	Object Class (Max 4)	Amount (Dollars)	(Cents)	Site/Project (Max 8)	Cost Org/Code (Max 7)
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Authorized Work Assignment Ceiling										
Contract Period:		Cost/Fee:				LOE:				
09/26/2012 To 09/25/2016										
This Action:										
Total:										
Work Plan / Cost Estimate Approvals										
Contractor WP Dated:					Cost/Fee:			LOE:		
Cumulative Approved:					Cost/Fee:			LOE:		
Work Assignment Manager Name William Swietlik <div style="display: flex; justify-content: space-between; margin-top: 10px;"> <div style="width: 45%; border-bottom: 1px solid black; text-align: center;">(Signature)</div> <div style="width: 45%; border-bottom: 1px solid black; text-align: center;">(Date)</div> </div>							Branch/Mail Code:			
							Phone Number 202-566-1129			
							FAX Number:			
Project Officer Name Meghan Hessenauer <div style="display: flex; justify-content: space-between; margin-top: 10px;"> <div style="width: 45%; border-bottom: 1px solid black; text-align: center;">(Signature)</div> <div style="width: 45%; border-bottom: 1px solid black; text-align: center;">(Date)</div> </div>							Branch/Mail Code:			
							Phone Number: 202-566-1040			
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Other Agency Official Name <div style="display: flex; justify-content: space-between; margin-top: 10px;"> <div style="width: 45%; border-bottom: 1px solid black; text-align: center;">(Signature)</div> <div style="width: 45%; border-bottom: 1px solid black; text-align: center;">(Date)</div> </div>							Branch/Mail Code:			
							Phone Number:			
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Contracting Official Name Brad Heath <div style="display: flex; justify-content: space-between; margin-top: 10px;"> <div style="width: 45%; border-bottom: 1px solid black; text-align: center;">(Signature)</div> <div style="width: 45%; border-bottom: 1px solid black; text-align: center;">10/30/2015</div> </div>							Branch/Mail Code:			
							Phone Number: 513-487-2352			
							FAX Number:			

EPA United States Environmental Protection Agency Washington, DC 20460 Work Assignment						Work Assignment Number 3-05				
						<input type="checkbox"/> Other <input checked="" type="checkbox"/> Amendment Number: 000002				
Contract Number EP-C-12-021			Contract Period 09/26/2012 To 09/25/2016			Title of Work Assignment/SF Site Name				
			Base Option Period Number 3			Eval of Industrial Dischargers				
Contractor EASTERN RESEARCH GROUP, INC.					Specify Section and paragraph of Contract SOW See PWS					
Purpose: <input type="checkbox"/> Work Assignment <input type="checkbox"/> Work Assignment Close-Out <input checked="" type="checkbox"/> Work Assignment Amendment <input type="checkbox"/> Incremental Funding <input checked="" type="checkbox"/> Work Plan Approval					Period of Performance From 10/30/2015 To 09/25/2016					
Comments: This Work Plan Approval incorporates Amendment 2.										
<input type="checkbox"/> Superfund Accounting and Appropriations Data <input checked="" type="checkbox"/> Non-Superfund										
Note: To report additional accounting and appropriations data use EPA Form 1900-69A.										
SFO (Max 2) <input type="checkbox"/>										
Line	DCN (Max 6)	Budget/FY (Max 4)	Appropriation Code (Max 6)	Budget Org/Code (Max 7)	Program Element (Max 9)	Object Class (Max 4)	Amount (Dollars)	(Cents)	Site/Project (Max 8)	Cost Org/Code (Max 7)
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Contract Period:		Cost/Fee: \$0.00				LOE: 0				
09/26/2012 To 09/25/2016										
This Action:		\$929,699.00				9,711				
Total:		\$929,699.00				9,711				
Work Plan / Cost Estimate Approvals										
Contractor WP Dated: 10/20/2015		Cost/Fee: \$929,699.00				LOE: 9,711				
Cumulative Approved:		Cost/Fee: \$929,699.00				LOE: 9,711				
Work Assignment Manager Name William Swietlik						Branch/Mail Code:				
_____ (Signature) (Date)						Phone Number 202-566-1129				
						FAX Number:				
Project Officer Name Meghan Hessenauer						Branch/Mail Code:				
_____ (Signature) (Date)						Phone Number: 202-566-1040				
						FAX Number:				
Other Agency Official Name						Branch/Mail Code:				
_____ (Signature) (Date)						Phone Number:				
						FAX Number:				
Contracting Official Name Brad Heath						Branch/Mail Code:				
_____ (Signature) (Date)						Phone Number: 513-487-2352				
						FAX Number:				

EPA United States Environmental Protection Agency Washington, DC 20460 Work Assignment						Work Assignment Number 3-05				
						<input type="checkbox"/> Other <input checked="" type="checkbox"/> Amendment Number: 000003				
Contract Number EP-C-12-021			Contract Period 09/26/2012 To 09/25/2016 Base Option Period Number 3			Title of Work Assignment/SF Site Name Eval of Industrial Discharges				
Contractor EASTERN RESEARCH GROUP, INC.					Specify Section and paragraph of Contract SOW N/A					
Purpose: <input type="checkbox"/> Work Assignment <input type="checkbox"/> Work Assignment Close-Out <input checked="" type="checkbox"/> Work Assignment Amendment <input type="checkbox"/> Incremental Funding <input type="checkbox"/> Work Plan Approval						Period of Performance From 12/29/2015 To 09/25/2016				
Comments: The purpose of this Amendment 3 is to ADD Phillip Flanders (Phone: 202-566-8323; Fax: 202-566-1053; E-Mail: flanders.phillip@epa.gov) as a Task Manager for Tasks 7 and 8.										
<input type="checkbox"/> Superfund Accounting and Appropriations Data <input checked="" type="checkbox"/> Non-Superfund										
Note: To report additional accounting and appropriations data use EPA Form 1900-69A.										
SFO (Max 2) <input type="checkbox"/>										
Line	DCN (Max 6)	Budget/FY (Max 4)	Appropriation Code (Max 6)	Budget Org/Code (Max 7)	Program Element (Max 9)	Object Class (Max 4)	Amount (Dollars)	(Cents)	Site/Project (Max 8)	Cost Org/Code (Max 7)
1										
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Authorized Work Assignment Ceiling										
Contract Period:		Cost/Fee:				LOE:				
09/26/2012 To 09/25/2016										
This Action:										
Total:										
Work Plan / Cost Estimate Approvals										
Contractor WP Dated:				Cost/Fee:			LOE:			
Cumulative Approved:				Cost/Fee:			LOE:			
Work Assignment Manager Name William Swietlik							Branch/Mail Code:			
<div style="border-bottom: 1px solid black; width: 100%;"></div> <div style="text-align: center;">(Signature)</div>							Phone Number 202-566-1129			
							FAX Number:			
Project Officer Name Meghan Hessenauer							Branch/Mail Code:			
<div style="border-bottom: 1px solid black; width: 100%;"></div> <div style="text-align: center;">(Signature)</div>							Phone Number: 202-566-1040			
							FAX Number:			
Other Agency Official Name							Branch/Mail Code:			
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Contracting Official Name Brad Heath							Branch/Mail Code:			
<div style="border-bottom: 1px solid black; width: 100%; text-align: center;"> </div> <div style="text-align: center;">(Signature)</div>							Phone Number: 513-487-2352			
							FAX Number:			
							<div style="border-bottom: 1px solid black; width: 100%; text-align: center;"> <div style="display: flex; justify-content: space-between;"> 12/29/2015 (Date) </div> </div>			

EPA United States Environmental Protection Agency Washington, DC 20460 Work Assignment						Work Assignment Number 3-05				
						<input type="checkbox"/> Other <input checked="" type="checkbox"/> Amendment Number: 000004				
Contract Number EP-C-12-021			Contract Period 09/26/2012 To 09/25/2016			Title of Work Assignment/SF Site Name				
			Base Option Period Number 3			Eval of Industrial Discharges				
Contractor EASTERN RESEARCH GROUP, INC.					Specify Section and paragraph of Contract SOW See PWS					
Purpose: <input type="checkbox"/> Work Assignment <input type="checkbox"/> Work Assignment Close-Out <input checked="" type="checkbox"/> Work Assignment Amendment <input type="checkbox"/> Incremental Funding <input type="checkbox"/> Work Plan Approval					Period of Performance From 07/29/2016 To 09/25/2016					
Comments:										
<input type="checkbox"/> Superfund Accounting and Appropriations Data <input checked="" type="checkbox"/> Non-Superfund										
SFO <input type="checkbox"/> (Max 2) Note: To report additional accounting and appropriations date use EPA Form 1900-69A.										
Line	DCN (Max 6)	Budget/FY (Max 4)	Appropriation Code (Max 6)	Budget Org/Code (Max 7)	Program Element (Max 9)	Object Class (Max 4)	Amount (Dollars)	(Cents)	Site/Project (Max 8)	Cost Org/Code
1										
2										
3										
4										
5										
Authorized Work Assignment Ceiling										
Contract Period:		Cost/Fee:				LOE:				
09/26/2012 To 09/25/2016										
This Action:										
Total:										
Work Plan / Cost Estimate Approvals										
Contractor WP Dated:					Cost/Fee			LOE:		
Cumulative Approved:					Cost/Fee			LOE:		
Work Assignment Manager Name William Swietlik							Branch/Mail Code:			
_____ (Signature) (Date)							Phone Number: 202-566-1129			
							FAX Number:			
Project Officer Name Meghan Hessenauer							Branch/Mail Code:			
_____ (Signature) (Date)							Phone Number: 202-566-1040			
							FAX Number:			
Other Agency Official Name							Branch/Mail Code:			
_____ (Signature) (Date)							Phone Number:			
							FAX Number:			
Contracting Official Name Brad Heath							Branch/Mail Code:			
_____ (Signature) (Date)							Phone Number: 513-487-2352			
							FAX Number:			

**Performance Work Statement
Contract EP-C-12-021
Work Assignment 3-05
Amendment 4**

Title: Evaluating Categories of Industrial Dischargers for Potential National Regulations

Work Assignment Contracting Officer's Representative (WACOR):

William F. Swietlik
U.S. EPA/OW/OST/EAD (4303T)
EPA West, Room 6231AA
1200 Pennsylvania Ave., N.W.
Washington, DC 20460
Phone: 202-566-1129
Fax: 202-566-1053
E-mail: swietlik.william@epa.gov

Alternate Work Assignment Contracting Officer's Representative (AWACOR):

Samantha Lewis
U.S. EPA/OW/OST/EAD (4303T)
EPA West, Room 6233F
1200 Pennsylvania Ave., N.W.
Washington, DC 20460
Phone: 202-566-1058
Fax: 202-566-1053
E-mail: lewis.samantha@epa.gov

Period of Performance: July 29, 2016 through September 25, 2016

Purpose:

The purpose of this amendment is twofold. First, to add Emily Trentacoste and Jezebele Alicea as Co-Task Managers for Task 5 under the original work assignment and to add Ahmar Siddiqui as a new Task Manager for Task 7 removing Phillip Flanders.

New Co-Task Manager under Task 5 work on Pesticides, OCPSF and Electronics and Electrical Components:

Emily Trentacoste
U.S. EPA/OW/OST/EAD (4303T)
EPA West, Room 6233M
1200 Pennsylvania Ave., N.W.
Washington, DC 20460

Phone: 202-566-0703
Fax: 202-566-1053
E-mail: trentacoste.emily@epa.gov

New Co-Task Manager under Task 5 for work on Nanomaterials, Batteries and Iron and Steel:

Jezebele Alicea
U.S. EPA/OW/OST/EAD (4303T)
EPA West, Room 6233Y
1200 Pennsylvania Ave., N.W.
Washington, DC 20460
Phone: 202-566-1755
Fax: 202-566-1053
E-mail: alicea.jezebele@epa.gov

New Task Manager under Task 7 work on Metal Finishing:

Ahmar Siddiqui
U.S. EPA/OW/OST/EAD (4303T)
EPA West, Room 6231S
1200 Pennsylvania Ave., N.W.
Washington, DC 20460
Phone: 202-566-1044
Fax: 202-566-1053
E-mail: siddiqui.ahmar@epa.gov

The second purpose of this amendment is to add more LOE to be able to complete work under the existing tasks that has taken more time than anticipated. This includes work on the industry investigations for the 2016 Annual Review Report under Task 5 for which data and information were harder to find than anticipated (10% of the additional LOE needed), the work under Task 6 for preparing the 304m website for which EPA decided to do a major overhaul (+10% LOE needed), the work under Task 8 on the HELGA Database which was more complicated to design than anticipated (20% extra LOE needed) and the work populating the IWTT Database for which more treatment performance studies were found than anticipated (10% of extra LOE needed). This also includes 10 additional site visits for Metal Finishing under Task 7 to collect more data and information to profile metal finishing processes, pollutant discharges and treatment technologies. Additional data is needed to more fully profile the metal finishing industry given the wide range of pollutant generating operations performed by this industry and changes in those operations since the original ELG (50% of the extra LOE needed).

EPA United States Environmental Protection Agency Washington, DC 20460 Work Assignment						Work Assignment Number 3-29				
						<input type="checkbox"/> Other <input type="checkbox"/> Amendment Number:				
Contract Number EP-C-12-021			Contract Period 09/26/2012 To 09/25/2016 Base Option Period Number 3			Title of Work Assignment/SF Site Name SE ELG Reg Support				
Contractor EASTERN RESEARCH GROUP, INC.					Specify Section and paragraph of Contract SOW 3.0, 3.1, 3.6, 3.7, 4.0, 4.7, 5.0					
Purpose: <input checked="" type="checkbox"/> Work Assignment <input type="checkbox"/> Work Assignment Close-Out <input type="checkbox"/> Work Assignment Amendment <input type="checkbox"/> Incremental Funding <input type="checkbox"/> Work Plan Approval						Period of Performance From 09/26/2015 To 09/25/2016				
Comments: Work shall not commence on this Work Assignment until September 26, 2015.										
<input type="checkbox"/> Superfund Accounting and Appropriations Data <input checked="" type="checkbox"/> Non-Superfund										
Note: To report additional accounting and appropriations data use EPA Form 1900-69A.										
SFO (Max 2) <input type="checkbox"/>										
Line	DCN (Max 6)	Budget/FY (Max 4)	Appropriation Code (Max 6)	Budget Org/Code (Max 7)	Program Element (Max 9)	Object Class (Max 4)	Amount (Dollars)	(Cents)	Site/Project (Max 8)	Cost Org/Code (Max 7)
1										
2										
3										
4										
5										
Authorized Work Assignment Ceiling										
Contract Period: Cost/Fee: LOE: 09/26/2012 To 09/25/2016										
This Action:										
Total:										
Work Plan / Cost Estimate Approvals										
Contractor WP Dated: Cost/Fee: LOE:										
Cumulative Approved: Cost/Fee: LOE:										
Work Assignment Manager Name Jezebele Alicea <div style="display: flex; justify-content: space-between;"> <div>_____</div> <div>_____</div> </div> <div style="display: flex; justify-content: space-between;"> <div>(Signature)</div> <div>(Date)</div> </div>							Branch/Mail Code: Phone Number 202-566-1755 FAX Number:			
Project Officer Name Meghan Hessenauer <div style="display: flex; justify-content: space-between;"> <div>_____</div> <div>_____</div> </div> <div style="display: flex; justify-content: space-between;"> <div>(Signature)</div> <div>(Date)</div> </div>							Branch/Mail Code: Phone Number: 202-566-1040 FAX Number:			
Other Agency Official Name <div style="display: flex; justify-content: space-between;"> <div>_____</div> <div>_____</div> </div> <div style="display: flex; justify-content: space-between;"> <div>(Signature)</div> <div>(Date)</div> </div>							Branch/Mail Code: Phone Number: FAX Number:			
Contracting Official Name Brad Heath <div style="display: flex; justify-content: space-between;"> <div>_____</div> <div>_____</div> </div> <div style="display: flex; justify-content: space-between;"> <div>(Signature)</div> <div>(Date)</div> </div>							Branch/Mail Code: Phone Number: 513-487-2352 FAX Number:			

**Performance Work Statement
Contract EP-C-12-021
Work Assignment 3-29**

Title: Steam Electric Effluent Guidelines Regulatory Support

Work Assignment Contracting

Officer's Representative (WACOR): Jezebele Alicea-Virella

Alternate Work Assignment Contracting

Officer's Representative (Alternate WACOR): Ronald Jordan

Task Manager (Task 3.1): William Swietlik

Period of Performance (POP): September 26, 2015 through September 25, 2016

New Contracting Terminology From Environmental Protection Agency Acquisition Guide (EPAAG) Subsection 1.6.5
Contract-Level Contracting Officer's Representative (CL-COR) = Project Officer (PO)
Alternate Contract-Level Contracting Officer's Representative (Alternate CL-COR) = Alternate Project Officer (APO)
Work Assignment Contracting Officer's Representative (WACOR) = Work Assignment Manager (WAM)
Alternate Work Assignment Contracting Officer's Representative (Alternate WACOR) = Alternate Work Assignment Manager (AWAM)

I- Purpose:

The purpose of this work assignment is to guide the contractor identifying tasks that need to be performed to provide regulatory support to EPA in the development of effluent limitations guidelines and standards for the steam electric power generating point source category (40 CFR Part 423). Specifically but not limited to technical support after final rule promulgation for the steam electric power generating industry category.

II- Introduction:

The Clean Water Act directs EPA to develop national regulations placing limits on the pollutants that are discharged by categories of industry to rivers and streams or to sewage treatment plants. During previous option periods, the contractor collected and analyzed information necessary to develop effluent limitations and guidelines (ELGs) for the steam electric power generating point source category (40 CFR Part 423). These effluent guidelines are under a consent decree to sign a decision taking final action on the rulemaking by September 30, 2015. This work assignment supports EPA's completion of the final rule including any necessary analyses, documentation, and record support after promulgation of the final rule. Also, following final rule promulgation, additional support associated but not limited to regulatory implementation, outreach and training to different stakeholders, and litigation is required under this work assignment.

Key tasks under this work assignment include:

- Providing technical support in planning and scoping rulemaking activities for the final rule.
- Providing support during final rule interagency review.
- Completing all analyses, documentation, and memoranda for the final rule.
- Compiling and organizing the rulemaking record for final regulation, including associated docket preparations, cleanup and sanitization.
- Continuing support developing written technical responses to comments received during proposal, including finalizing the response to comments document.
- Evaluating technical data submitted in comments and revise technical methodology and analyses, as appropriate.
- Providing technical support for outreach and implementation activities, including public meetings and trainings.
- Assisting in litigation including compiling and organizing the final docket index as defined and required by the court.

II- General Work Assignment Requirements (PWS Section 3.0)

Deliverable Formatting and Terminology

Throughout this work assignment, the contractor shall provide draft and final reports to electronic format, with hard copy format also provided when directed by the WACOR. The WACOR and contractor will use the terminology defined in Attachment A to improve the deliverable review process. The contractor shall discuss the computer file formats to be used for word processing, spreadsheet, database and graphics with the WACOR prior to file preparation.

In addition, the WACOR will identify for the contractor which documents will be posted on EPA's Effluent Guidelines webpage (http://water.epa.gov/scitech/wastetech/guide/steam_index.cfm). These documents posted to the Effluent Guidelines webpage must be Section 508 compliant.¹

Travel

Non-local travel by the contractor employees or subcontractors will be required to support the scope of this work assignment. The contractor shall provide specific travel details and costs for any travel directly chargeable under this WA and must submit it for travel approval by the WACOR and the Contract-Level COR (CL-COR) before each trip occurs (as specified by the contract per clause H.32).

Under this WA, EPA staff is planning to attend the International Water Conference on November 15-19, 2015 in Orlando, Florida. For planning purposes, the contractor shall include one staff attending this conference to support EPA.

Guidance Regarding Conferences

No single event under this Work Assignment is anticipated to exceed \$20,000. The Contractor shall immediately notify the EPA Contracting Officer (CO), CL-COR and WACOR of any anticipated event involving support for a meeting, conference, workshop, symposium, retreat, seminar or training that may potentially incur \$20,000 or more in cost during performance.

¹ See <http://www.epa.gov/epahome/accessibility.htm>.

Conference expenses are all direct and indirect costs paid by the government and include any associated authorized travel and per diem expenses, room charges for official business, audiovisual use, light refreshments, registration fees, ground transportation and other expenses as defined by the Federal Travel Regulations. All outlays for conference preparation should be included, but the federal employee time for conference preparation should not be included. After notifying EPA of the potential to reach this threshold, the Contractor shall not proceed with the task(s) until authorized to do so by the Contracting Officer.

Confidential Business Information

During the course of the work assignment, the contractor will be accessing and evaluating CBI. The contractor shall, at all times, adhere to Confidential Business Information (CBI) procedures when handling industry information. The contractor shall manage all reports, documents, and other materials and all draft documents developed under this work assignment in accordance with the procedures set forth in the "Security Plan for Handling Confidential Business Information Under the Clean Water Act" (September 2002) or its successor approved plans.

Identification as Contracting Staff

To avoid the perception that contractor personnel are EPA employees, contractor personnel shall be clearly identified as independent contractors of EPA when participating in events with outside parties and visiting field sites. When speaking with the public the contractor should refer all interpretations of policy to the WACOR.

Limitation of Contractor Activities

The contractor shall submit drafts of all deliverables to the WACOR for review prior to submission of the final product. The contractor shall incorporate all WACOR comments into all final deliverables, unless otherwise agreed upon by the WACOR. The contractor will adhere to all applicable EPA management control procedures as implemented by the CO, CL-COR, and WACOR.

Deliverable Due Dates

For developing this WA workplan, the contractor shall assume the deliverable due dates in the tables for each task presented further. The WACOR needs to provide to the contractor technical direction where deliverable dates are not specified in tables. Major technical deliverables shall be subject to internal contractor peer review by an expert(s) not directly involved in the mainstream Work Assignment tasks. Deliverables will be prepared with proper adherence to EPA style and format requirements.

III- Tasks

Task 1 – Program Management (PWS Section 3.0)

The contractor shall develop a detailed work plan that outlines the approach and methodology necessary for each task identified in this work assignment. The work plan shall specify the necessary steps for each task; list of the personnel projected to participate; direct and indirect costs such as labor, and travel; and estimated hours and budget by task and deliverables to complete this work assignment. The work plan shall be submitted to the CO, CL-COR and WACOR in accordance with contract requirements.

The contractor shall prepare and submit electronic monthly progress reports to the CO, CL-COR and WACOR. This progress report will document the costs incurred and work performed during the previous accounting period, and the work planned for the current accounting period.

In addition to a monthly progress report, the contractor shall prepare mid-monthly and monthly status summaries to the CL-COR and WACOR. The mid-monthly and monthly status reports shall list the following information by task: summaries of costs and LOE expended for the reporting period; a table of hours by personnel for each task; and the cumulative hours (LOE) and dollars (and the percentage of each) expended for each task. The mid-monthly and monthly summaries of costs and expenditures LOE shall be provided prior to the progress report. These reports and summaries shall use a format similar to that used by the contractor to report such information for previous option periods work assignments (WA 0-29, 1-29, and 2-29). The contractor shall inform the CO, CL-COR and WACOR in writing when 50%, 75%, and 90% of the allocated hours or dollars have been expended.

TASK 1 – DELIVERABLES	
Deliverable	Due Date
Work Plan	In accordance with contract requirements
Monthly Progress Reports	Monthly
Monthly & Mid-monthly Status Summaries	Mid-monthly and monthly

Task 2 – Quality Assurance (PWS Section 3.1)

Tasks included in this work assignment are continuing work for the steam electric effluent guidelines regulatory support approved under WA 9-29 of a previous contract (68-C-02-095) and under previous options work assignments (WA 0-29, 1-29, and 2-29) of current contract (EP-C-12-021). See Attachment B for effluent guidelines development process. In this WA, the contractor shall continue tasks as previously approved in QAPP – Revision 4, dated April 2013. In addition, the contractor shall evaluate when revisions to current QAPP are necessary and communicate with the WACOR to determine a delivery date to address them by providing a technical direction.

2.1 Background

Quality Assurance Project Plans are required under the Agency’s Quality Assurance Policy CIO-2105, formerly EPA Order 5360.1 A2 (May 2000), and implementing guidance CIO-2105-P-01-0 (May 2000). All projects that involve the generation, collection, analysis, and use of environmental data must have an approved Quality Assurance Project Plan (QAPP) in place prior to the commencement of the work. Examples of these environmental data operations are provided in **Table 1-1** below.

Table 1-1. Examples of work that involves the collection, generation, evaluation, analysis, or use of environmental data

Item	Examples
Data	Includes field sampling information (sample location information, flow measurements, temperature, pH, physical observations, etc.), laboratory measurements (e.g., chemical, physical, biological, radiological measurements), data collected from questionnaires, economic data, census data, and any other types of existing data (i.e., data generated for a different purpose or generated by a different organization)
Data generation	Includes field studies, laboratory studies, and generation of modeling output
Data collection	Includes field surveys, questionnaire surveys, literature searches, and third party data
Data evaluation	Includes data inspection, review, assessment, and validation
Data analysis	Includes statistical, engineering, and economic analysis, and testing, evaluation, and validation of methods and models; database creation, data extraction, and data manipulation
Data Use	Any use of data to support EPA decisions, regulations, policy, publications, or tools (including effluent guidelines, 304(m) program, standards, environmental assessments, and models, tools, or reports disseminated by EPA to assist other organizations in implementing environmental programs)

Note that QAPPs are required for the development or revision of models and software that support the generation, collection, evaluation, analysis, or use of data. (A model is set of equations and assumptions used to predict unknown data.) When existing models are used as a tool to generate or evaluate data, the project QAPP must describe the model and explain how it will be used and how its output will be evaluated to ensure the modeling effort meets the overall quality objectives for the project. Development or revision of new models also must be supported by a QAPP that describes the objectives for the model, the quality criteria that will be applied to the model, and the procedures for evaluating whether the model meets those criteria.

2.2 QA Project Plan Requirements

The Contractor has previously prepared a contract-wide Programmatic QAPP (PQAPP) for Contract EP-C-12-021. This PQAPP describes, in a single document, information that is not site or time-specific, but applies throughout the program (i.e., the duration of the contract). When tasked with preparing the PQAPP, the Contractor was informed that the PQAPP may need to be supplemented with project-specific details to support individual work assignments that involve the collection, generation, evaluation, analysis, or use of environmental data.

The activities in this work assignment involve gathering, evaluating, analyzing, and otherwise using existing environmental data (also known as “secondary” use of data). However, EPA has determined that the Contractor is operating under the existing PQAPP and that the PQAPP addresses QA requirements for this work assignment.

In support of this work assignment, the Contractor shall ensure that the work plan provides enough detail to clearly describe specific objectives of the project(s) supported by this work assignment, including typical questions that must be answered when collecting and analyzing existing data to support effluent limitations and guidelines industry rulemaking.

- The type of data to be gathered or used under this work assignment to support the project objectives—including data from search engines, federal databases, EPA data bases—as a well as a rationale for when those databases are appropriate and what data available in each will support the project
- The quality objectives needed to ensure the data will support the project objectives, and
- The QA/QC activities to be performed to ensure that any results obtained are documented and are of the type, quality, transparency, and reproducibility needed.

2.3 Additional QA Documentation Required

The EPA Quality Manual for Environmental Programs (CIO 2105-P-01-0, May 2000) requires published Agency reports containing environmental data to be accompanied by a readily identifiable section or appendix that discusses the quality of the data and any limitations on the use of the data with respect to their originally intended application. The EPA Quality Manual further requires Agency reports to be reviewed by the QA manager (or other authorized official) before publication to ensure that an adequate discussion of QA and QC activities is included. The purpose of the review is to ensure the reports provide enough information to enable a knowledgeable reader to determine if the technical and quality goals were met for the intended use of the data. Reports should include applicable statements regarding the use of any environmental data presented as a caution about possible misuse of the data for other purposes.

For example, a Technical Support Document or Study Report must include a clear discussion of the quality management strategies (including the project goals and objectives, quality objectives and criteria, and QA/QC practices) that were employed to control and document the quality of data generated and used. These documents should also discuss any deviations from procedures documented in the EPA-approved QAPP(s) supporting the project, the reasons for those deviations, any impact of those deviations had on data quality, and steps taken to mitigate data quality issues.

In support of this Agency requirement, all major deliverables (e.g., Technical Support Documents, Study Reports, Analytical Methods) produced by the Contractor under this work assignment must include a discussion of the QA/QC activities that were performed to support the deliverable, and this discussion must provide a sufficient level of detail to allow the EAD QA Coordinator (or designee) to determine if the QA/QC strategies implemented for the project sufficiently support the intended use of the data. Upon receipt, the WACOR will review each applicable report and certify whether the Contractor has adhered to the QA requirements documented in the Contractor's PQAPP.

The Contractor also shall provide EPA with monthly reports of QA activities performed during implementation of this work assignment. These monthly QA reports shall identify QA activities performed to support implementation of this work assignment, problems encountered, deviations from the QAPP, and corrective actions taken. If desired, the Contractor may include this as a part of the contract-required monthly financial and technical progress report.

2.4 Data Quality Act/Information Quality Guidelines Requirements

The Data Quality Act (also known as the Information Quality Act) requires EPA to ensure that influential information disseminated by the Agency is sufficiently transparent in terms of data and methods of analysis that the information is capable of being substantially reproduced. To support compliance with these data transparency/ data reproducibility requirements, EPA plans to include QAPPs as part of any rulemaking record documentation to be made available to the public. (This includes PQAPPs and SQAPPs.) The Contractor may claim information in QAPPs as confidential; if the Contractor chooses to do so, the Contractor shall submit a sanitized (i.e., public) version and an unsanitized (i.e., confidential) version at the time the QAPP is submitted for approval by EPA. The sanitized version shall be included in the public docket for the applicable rulemaking (or other docket record), and the unsanitized version shall be included in a non-public (i.e., confidential) portion of the docket (or record).

Information contained in the approved QAPP shall be transparent and reproducible and meet the requirements of the Data Quality Act for influential information. EPA's Guidelines for Ensuring and Maximizing the Quality, Objectivity, Utility, and Integrity, of Information Disseminated by the Environmental Protection Agency (EPA/260R-02-008, October 2002), referred to as "EPA's Information Quality Guidelines," describe EPA procedures for meeting Data Quality Act requirements. Section 6.3 of EPA's Information Quality Guidelines indicate that "especially rigorous robustness checks" should be applied in circumstances where quality-related information cannot be disclosed due to confidentiality issues. Where applicable, the Contractors should indicate which results were obtained using the tools (SOPs, checklists, and guidelines) that the Contractor designates as confidential so that the WACOR can easily identify the areas that shall require rigorous robustness checks and document that those checks have been performed. At the discretion of the WACOR, the Contractors may be requested to prepare pre-dissemination review checklist as described in Section 5.5 of the Office of Water Quality Management Plan, February 2009. If this is required, the WACOR shall notify the Contractor through written technical direction.

Tasks included in this work assignment are continuing work for the steam electric effluent guidelines that was covered by the QAPP approved on April 2013.

TASK 2 – DELIVERABLES	
Deliverable	Due Date
Monthly Reports of QA work performed (may be included in the Contractor's monthly progress report)	Monthly throughout the WA period of performance

Task 3 – Technical and Record Support for Completion of the Final Rule (PWS Section 3.6, 3.7, 4.0, 4.7, 5.0)

During a previous option period, the contractor collected, analyzed information necessary to develop effluent guidelines regulations for the steam electric power generating point source category proposed rule. In this WA, contractor shall continue necessary tasks to support promulgation and implementation of the final rule. The contractor shall provide technical support related to the following: characterization of pollutant discharges, industry profile, analyses of industry survey data, technology and process

change evaluations, calculation of compliance costs and pollutant reductions, comments responses, and preparation of the technical development document and other supporting documentation and memoranda, and other tasks as identified by the WACOR.

In addition, the contractor shall provide support in responding to Freedom of Information Act (FOIA) requests for records. Such support includes researching existing documentation to identify potentially responsive records for the FOIA request or any FOIA appeal, and assisting EPA in compiling responsive documents. For purposes of developing the workplan, the contractor shall assume that there will be at least five FOIA requests for which support described above may be required.

The contractor shall assemble and maintain a record of all documents relevant to the rulemaking proceedings, including preparing electronic versions of documents for the Agency's electronic docket system and preparing non-CBI versions (sanitized) of documents for public release. The contractor shall maintain an index of record materials and deliver the index to the WACOR quarterly. When directed by the WACOR, the contractor shall deliver record documents to the electronic docket. The project file index will contain project file-only documents in addition to all draft record index documents. Only those documents that are part of the public docket shall be included in the final record index submitted with the docket.

The contractor shall also assist in assembling the electronic docket, following EPA's policy for Section 508 compliance as issued by the Edocket office. The contractor shall properly maintain any non-record working files in its possession including timely disposition in accordance with EPA records management policy. This includes any necessary cleanup of files and transfer of CBI records to the Federal Records Center.

As part of this effort, the contractor shall participate in the International Water Conference, as described under the travel section, to obtain newly-released information on the state-of-the-art treatment technologies for waste streams under study.

TASK 3 – DELIVERABLES	
Deliverable	Due Date
Draft text for inclusion in Federal Register notice, preambles and notices of data availability; draft regulatory text	September 30, 2015
Final TDD	September 30, 2015
Final Preamble	September 30, 2015
Cost and Loads Report – Final Sanitized Version for the rulemaking docket	By written technical direction
Final Response to Comments document	September 30, 2015

TASK 3 – DELIVERABLES	
Deliverable	Due Date
Final rule support materials – final sanitized versions for the rulemaking docket	TDB by WACOR
Index of record materials	Quarterly
Index of items in the docket for the final rule	By written technical direction
Complete the upload of documents to the docket for the final rule	By written technical direction
Identify/compile FOIA-responsive records	By written technical direction

Task 3.1 - Environmental Engineering Analyses

The contractor shall continue work provided under WA 2-29 and Amendment 1. In this WA, the contractor shall provide all necessary technical and scientific support to EPA to complete the environmental assessment (EA) work required for the steam electric effluent limitations guidelines final rule and necessary support after its publication regarding documentation, reports and final rule docket development as stated under Task 3. Under Task 3.1, the contractor shall provide support for the following tasks:

- Finish conducting any EA analyses or methodologies as directed by the WACOR in support of the final ELG rule.
- Provide any lingering support on response to comments on environmental impacts/environmental improvements and other EA issues for the final rule.
- Meet with EPA to discuss and compare approaches used in the steam electric EA analyses in relation to risk assessment approaches used in other EPA programs or with other ELG rulemakings.

TASK 3.1 – DELIVERABLES	
Deliverable	Due Date
Finish conducting any EA analyses or methodologies as directed by the WACOR in support of the final ELG rule.	Ongoing during period of performance.
Provide support on response to comments on environmental impacts/environmental improvements and other EA issues for the final rule.	By written technical direction
Meet with EPA to discuss and compare approaches used in	By written technical direction

the steam electric EA analyses in relation to risk assessment approaches used in other EPA programs or with other ELG rulemakings.	
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Task 4 – Litigation Support

This task includes administrative index assembly, record searches, review of EPA response to comment essays, and other searching and analysis related to litigation of the CWA section 316(b) rule. Note that litigation support tasks related to implementation and permitting support falls under Task 6. This task may also include technical support and permit review for purpose of developing briefings.

Under this task, the contractor shall assemble the final docket index as defined and required by the court. Contractor shall note that this item may be different than maintaining the public docket index and the project file index as described in Task 3. Also, the contractor shall conduct searches of comments and responses to support Agency legal briefings, and shall retrieve record items in support of Agency litigation. For purposes of the workplan, assume this will require initiation of EPA legal briefs and preparations in early 2016.

TASK 4 – DELIVERABLES	
Deliverable	Due Date
Develop documentation in support of legal challenges of the final rule.	By written technical direction
Identify and compile litigation-responsive records and final docket index	By written technical direction

Task 5: Implementation and training support (PWS 3.7)

Activities under this task support the development of implementation support documents for permit writers and the regulated industry. This task includes preparation of training materials, frequently asked questions, fact sheets, question and answer documents, case studies, cost tools, compliance cost calculators, development of benchmarks and document review processes for internal consistency, and related implementation support activities. This task also includes assistance in the development of a module(s) for the NPDES permit writer training sessions.

Because of the complex nature of the ELGs, support will be provided to collect, compile, analyze, and present information and data, which may be used to develop the technical and scientific basis of draft guidance on NPDES permitting. Supplemental memos and supporting documents will be designed to provide permit writers responsible for issuing permits with information and data on control strategies, technology performance information, assessment methodologies and tools, water quality concerns, environmental impacts, and sampling techniques. These documents may also provide draft model permit language for steam electric power plants.

TASK 5 – DELIVERABLES	
Deliverable	Due Date
Draft implementation and support and training materials	By written technical direction

Task 6 – General Technical Support (PWS Section 3.6, 3.7)

Using information provided by the WACOR, along with information gathered or developed by the contractor, the contractor shall assemble information and perform analyses related to steam electric power plant discharges as directed by the WACOR through written technical direction. Much of the information used is expected to be an outgrowth of data collected under the other tasks of this work assignment.

The tasks may include work such as support in preparing or gathering data for presentation at technical meetings, summarizing data to brief management on aspects of power plant operations, or preparing materials and participating in meetings, conferences and workshops to support EPA's outreach activities to the public, industry, and regulatory authorities. These materials may include reports, brochures, leaflets, posters, or other presentation materials. For purposes of preparing a work plan, the contractor shall assume there will be approximately ten written technical directives.

TASK 6 – DELIVERABLE	
Deliverable	Due Date
General technical support (as described above)	By written technical direction

Attachment A – Improving the Deliverable Review Process

Work Assignment 3-29 involves the production of several types of written products ranging from deliberative memos to published reports. The general work flow is for EPA to provide written guidance to the contractor on the development of these products. The contractor then develops the initial versions of these products. EPA reviews and revises these documents prior to finalization. Several iterations of development, review, and revision may be necessary prior to product finalization. The WACOR and contractor will use the following terminology and clarify the expectations for each deliverable via written direction.

Clarification of Terminology

One way for EPA to anticipate the amount of EPA review necessary for a contractor deliverable would be to better define the phase or version of the document in the development, review, and revision process. The following terms will be used in describing the phase or version of the contractor's deliverables: Concept Memo, First Draft, and Draft Final. These phases are described below.

Concept Memo – A document used to present ideas for discussion. The writing style is not necessarily formal and may be as simple as presenting a list of ideas or options. The concept memo is considered an internal deliberative document and may be the result of prior topic discussions (and brainstorming meetings) between EPA, the contractor, and other stake-holders. EPA does not expect this type of document to have received senior technical review or the input of a technical editor. However, the concept memo is expected to have received some level of review (*e.g.*, an internal contractor “peer-to-peer” review) prior to delivery to EPA. Based on past experience, a concept memo is most useful as a tool to guide EPA in determining the desired audience and structure of a future “public-ready” work product.

First Draft – An early version of a document that will ultimately be “public-ready”. The document may still be an internally deliberative product. The writing style is clear but formal. The audience and structure (such as outline or questions to be answered) have been previously defined by and reviewed with EPA. This version is considered appropriate for senior technical review, particularly to confirm that the document answers the questions it is meant to address and that the document is appropriate for the intended audience. It is reasonable to expect that senior technical review may lead to further conversations with EPA. EPA's review of the deliverable is intended to confirm that ideas and concepts are presented as intended.

Draft Final – A “public-ready” document that is ready for distribution to an internal audience (*e.g.*, EPA workgroup) or external audience (*e.g.*, EPA's Docket). The contractor shall confirm with EPA the intended audience for this document. Additionally, this version of the document incorporates EPA's comments on the previous versions of the document. Prior to submission to EPA the document will be reviewed by a technical editor to ensure consistency with the Executive Memorandum on 1 June 1998 directing the Executive Departments and Agencies to write in plain language. Specifically, the technical editor will revise the document to address the following questions.²

- Is the document organized to serve the needs of readers?
- Does the document explain how it is organized and how to use it?
- Does the document start with items of most interest to reader?

² These questions were modified from the following EPA's website: <http://www.epa.gov/plainlanguage/faqs.htm>

- Are the chapter, table, and figure titles descriptive and helpful to readers in finding specific information more easily?
- Are complicated topics summarized before describing all the details?
- Does the document use the active voice?
- Does the document include only information readers actually need?
- Does the document use easy-to-read design features like lists, tables, graphics, and “white space”?
- Are citations for references clearly identified and does the reader know how to gain access to these references?

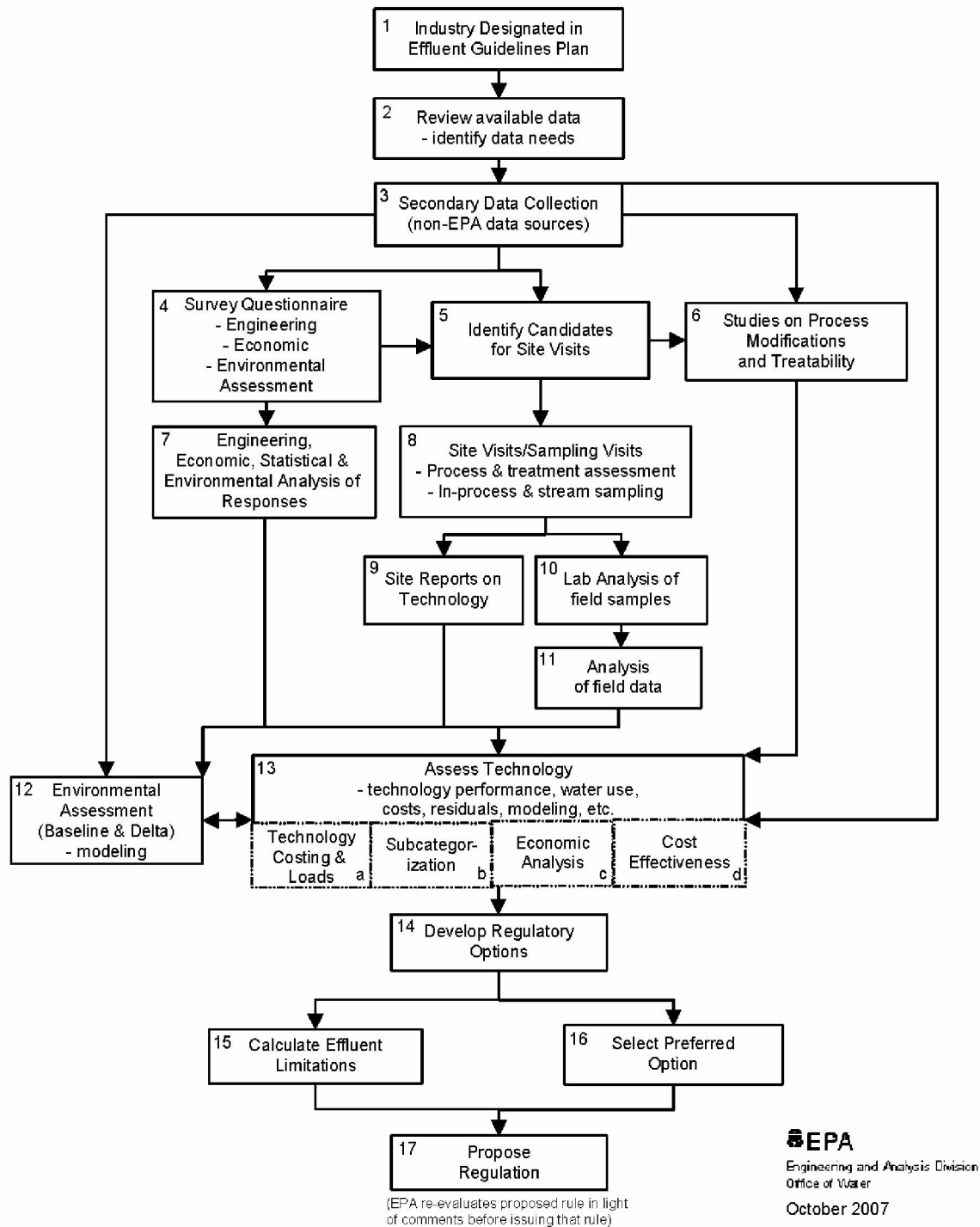
Additionally, the contractor will get approval from EPA on any other style sheets for Draft Final documents.

Clarification of EPA’s Expectations for Deliverables

The deliverable review process can be improved if EPA clearly states its expectations for when senior technical review should take place and the purpose of the review. Specifically, EPA should identify for the contractor the “big-picture” objectives and questions for the senior technical review to address. The review should be able to comment on the clarity of the document and whether the document met the objectives and answered the questions identified by EPA. The contractor will share with EPA a summary of the review.

Attachment B

Effluent Guidelines Development Process



EPA United States Environmental Protection Agency Washington, DC 20460 Work Assignment						Work Assignment Number 3-29	
						<input type="checkbox"/> Other <input type="checkbox"/> Amendment Number:	
Contract Number EP-C-12-021		Contract Period 09/26/2012 To 09/25/2016		Title of Work Assignment/SF Site Name			
		Base Option Period Number 3		SE ELG Reg Support			
Contractor EASTERN RESEARCH GROUP, INC.				Specify Section and paragraph of Contract SOW 3.0, 3.1, 3.6, 3.7, 4.0, 4.7, 5.0			
Purpose: <input checked="" type="checkbox"/> Work Assignment <input type="checkbox"/> Work Assignment Close-Out <input type="checkbox"/> Work Assignment Amendment <input type="checkbox"/> Incremental Funding <input checked="" type="checkbox"/> Work Plan Approval				Period of Performance From 09/26/2015 To 09/25/2016			
Comments:							
<input type="checkbox"/> Superfund Accounting and Appropriations Data <input checked="" type="checkbox"/> Non-Superfund							
SFO <input type="checkbox"/> (Max 2) Note: To report additional accounting and appropriations data use EPA Form 1900-69A.							
Line	DCN (Max 6)	Budget/FY (Max 4)	Appropriation Code (Max 6)	Budget Org/Code (Max 7)	Program Element (Max 9)	Object Class (Max 4)	Amount (Dollars) (Cents) Site/Project (Max 8) Cost Org/Code (Max 7)
1							
2							
3							
4							
5							
Authorized Work Assignment Ceiling							
Contract Period:		Cost/Fee: \$0.00		LOE: 0			
09/26/2012 To 09/25/2016							
This Action:		\$267,450.00		2,690			
Total:		\$267,450.00		2,690			
Work Plan / Cost Estimate Approvals							
Contractor WP Dated: 10/20/2015		Cost/Fee: \$267,450.00		LOE: 2,690			
Cumulative Approved:		Cost/Fee: \$267,450.00		LOE: 2,690			
Work Assignment Manager Name Jezebele Alicea						Branch/Mail Code:	
_____ (Signature) (Date)						Phone Number 202-566-1755	
						FAX Number:	
Project Officer Name Meghan Hessenauer						Branch/Mail Code:	
_____ (Signature) (Date)						Phone Number: 202-566-1040	
						FAX Number:	
Other Agency Official Name						Branch/Mail Code:	
_____ (Signature) (Date)						Phone Number:	
						FAX Number:	
Contracting Official Name Brad Heath						Branch/Mail Code:	
_____ (Signature) (Date)						Phone Number: 513-487-2352	
						FAX Number:	

EPA United States Environmental Protection Agency Washington, DC 20460 Work Assignment						Work Assignment Number 3-29				
						<input type="checkbox"/> Other <input checked="" type="checkbox"/> Amendment Number: 000001				
Contract Number EP-C-12-021			Contract Period 09/26/2012 To 09/25/2016			Title of Work Assignment/SF Site Name				
			Base Option Period Number 3			SE ELG Regulatory Support				
Contractor EASTERN RESEARCH GROUP, INC.					Specify Section and paragraph of Contract SOW See PWS					
Purpose:					Period of Performance					
<input type="checkbox"/> Work Assignment <input type="checkbox"/> Work Assignment Close-Out <input checked="" type="checkbox"/> Work Assignment Amendment <input type="checkbox"/> Incremental Funding <input type="checkbox"/> Work Plan Approval					From 03/30/2016 To 09/25/2016					
Comments:										
<input type="checkbox"/> Superfund Accounting and Appropriations Data <input checked="" type="checkbox"/> Non-Superfund										
SFO <input type="checkbox"/> (Max 2) Note: To report additional accounting and appropriations date use EPA Form 1900-69A.										
Line	DCN (Max 6)	Budget/FY (Max 4)	Appropriation Code (Max 6)	Budget Org/Code (Max 7)	Program Element (Max 9)	Object Class (Max 4)	Amount (Dollars)	(Cents)	Site/Project (Max 8)	Cost Org/Code
1										
2										
3										
4										
5										
Authorized Work Assignment Ceiling										
Contract Period:		Cost/Fee:		LOE:						
09/26/2012 To 09/25/2016										
This Action:										
Total:										
Work Plan / Cost Estimate Approvals										
Contractor WP Dated:				Cost/Fee			LOE:			
Cumulative Approved:				Cost/Fee			LOE:			
Work Assignment Manager Name Ronald Jordan							Branch/Mail Code:			
							Phone Number: 202-566-1003			
_____ (Signature) (Date)							FAX Number:			
Project Officer Name Meghan Hessenauer							Branch/Mail Code:			
							Phone Number: 202-566-1040			
_____ (Signature) (Date)							FAX Number:			
Other Agency Official Name							Branch/Mail Code:			
							Phone Number:			
_____ (Signature) (Date)							FAX Number:			
Contracting Official Name Brad Heath							Branch/Mail Code:			
							Phone Number: 513-487-2352			
_____ (Signature) (Date)							FAX Number:			

**Performance Work Statement
Contract EP-C-12-021
Work Assignment 3-29
Amendment I**

Title: Steam Electric Effluent Guidelines Regulatory Support

Work Assignment COR (WACOR): Ron Jordan

Alternate WACOR: Jezebele Alicea Virella

Task Manager (Task 3.1): William Swietlik

Period of Performance (POP): March 30, 2016 through September 25, 2016

I- Purpose:

Under work assignment 3-29, the contractor is providing technical support to EPA related to implementation and litigation defense. This amendment increases the level of effort for the work assignment largely to address an increased level of effort for Task 4 (Litigation Support) and Task 5 (Implementation and Training Support). In addition, this amendment switches the Primary and Alternate WACORs.

Legal challenges to the rule have been greater than EPA anticipated and industry petitioners are moving to file an additional legal challenge related to EPA's withholding certain confidential business information (CBI) from the public docket. Actions such as this are requiring a higher level of litigation support than anticipated. Support includes review of technical issues associated with documented analyses and compilation of all CBI documents in the rulemaking record to make available to the Court.

The degree of outreach with EPA Regional offices and state regulators has been greater than anticipated when issuing WA 3-29, and many issues raised are complex due to the need to ensure the guidance issued by EPA headquarters takes into account both the effluent guidelines and related requirements established by the coal combustion residuals rule. In addition, at least one steam electric power plant operator is submitting a request for a fundamentally different factors variance, which will require detailed analysis of the technical merits of the submittal. Should EPA ultimately grant a variance, there will also be a need to identify the appropriate technology basis and to calculate alternative limits based on the performance of the identified technology.

EPA United States Environmental Protection Agency Washington, DC 20460 Work Assignment						Work Assignment Number 3-29	
						<input type="checkbox"/> Other <input checked="" type="checkbox"/> Amendment Number: 000001	
Contract Number EP-C-12-021			Contract Period 09/26/2012 To 09/25/2016 Base Option Period Number 3			Title of Work Assignment/SF Site Name SE ELG Regulatory Support	
Contractor EASTERN RESEARCH GROUP, INC.				Specify Section and paragraph of Contract SOW See PWS			
Purpose: <input type="checkbox"/> Work Assignment <input type="checkbox"/> Work Assignment Close-Out <input checked="" type="checkbox"/> Work Assignment Amendment <input type="checkbox"/> Incremental Funding <input checked="" type="checkbox"/> Work Plan Approval						Period of Performance From 03/30/2016 To 09/25/2016	
Comments: This Work Plan Approval incorporates Amendment 1.							
<input type="checkbox"/> Superfund Accounting and Appropriations Data <input checked="" type="checkbox"/> Non-Superfund							
SFO <input type="checkbox"/> Note: To report additional accounting and appropriations date use EPA Form 1900-69A. (Max 2)							
Line	DCN (Max 6)	Budget/FY (Max 4)	Appropriation Code (Max 6)	Budget Org/Code (Max 7)	Program Element (Max 9)	Object Class (Max 4)	Amount (Dollars) (Cents) Site/Project (Max 8) Cost Org/Code
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2							
3							
4							
5							
Authorized Work Assignment Ceiling							
Contract Period:		Cost/Fee: \$267,450.00		LOE: 2690			
09/26/2012 To 09/25/2016							
This Action:		\$212,384.00		2,100			
Total:		\$479,834.00		4,790			
Work Plan / Cost Estimate Approvals							
Contractor WP Dated: 04/25/2016		Cost/Fee \$212,384.00		LOE: 2,100			
Cumulative Approved:		Cost/Fee \$479,834.00		LOE: 4,790			
Work Assignment Manager Name Ronald Jordan <div style="display: flex; justify-content: space-between;"> <div>_____ (Signature)</div> <div>_____ (Date)</div> </div>						Branch/Mail Code:	
						Phone Number: 202-566-1003	
						FAX Number:	
Project Officer Name Meghan Hessenauer <div style="display: flex; justify-content: space-between;"> <div>_____ (Signature)</div> <div>_____ (Date)</div> </div>						Branch/Mail Code:	
						Phone Number: 202-566-1040	
						FAX Number:	
Other Agency Official Name <div style="display: flex; justify-content: space-between;"> <div>_____ (Signature)</div> <div>_____ (Date)</div> </div>						Branch/Mail Code:	
						Phone Number:	
						FAX Number:	
Contracting Official Name Brad Heath <div style="display: flex; justify-content: space-between;"> <div>_____ (Signature)</div> <div>_____ (Date)</div> </div>						Branch/Mail Code:	
						Phone Number: 513-487-2352	
						FAX Number:	

EPA United States Environmental Protection Agency Washington, DC 20460 Work Assignment						Work Assignment Number 3-30				
						<input type="checkbox"/> Other <input type="checkbox"/> Amendment Number:				
Contract Number EP-C-12-021			Contract Period 09/26/2012 To 09/25/2016 Base Option Period Number 3			Title of Work Assignment/SF Site Name AK Seafood ELG				
Contractor EASTERN RESEARCH GROUP, INC.					Specify Section and paragraph of Contract SOW See PWS					
Purpose: <input checked="" type="checkbox"/> Work Assignment <input type="checkbox"/> Work Assignment Close-Out <input type="checkbox"/> Work Assignment Amendment <input type="checkbox"/> Incremental Funding <input type="checkbox"/> Work Plan Approval						Period of Performance From 09/26/2015 To 09/25/2016				
Comments: Work shall not commence on this Work Assignment until September 26, 2015.										
<input type="checkbox"/> Superfund Accounting and Appropriations Data <input checked="" type="checkbox"/> Non-Superfund										
Note: To report additional accounting and appropriations data use EPA Form 1900-69A.										
SFO (Max 2) <input type="checkbox"/>										
Line	DCN (Max 6)	Budget/FY (Max 4)	Appropriation Code (Max 6)	Budget Org/Code (Max 7)	Program Element (Max 9)	Object Class (Max 4)	Amount (Dollars)	(Cents)	Site/Project (Max 8)	Cost Org/Code (Max 7)
1										
2										
3										
4										
5										
Authorized Work Assignment Ceiling										
Contract Period:		Cost/Fee:			LOE:					
09/26/2012 To 09/25/2016										
This Action:										
Total:										
Work Plan / Cost Estimate Approvals										
Contractor WP Dated:				Cost/Fee:			LOE:			
Cumulative Approved:				Cost/Fee:			LOE:			
Work Assignment Manager Name Meghan Hessenauer							Branch/Mail Code:			
_____ (Signature) (Date)							Phone Number 202-566-1040			
							FAX Number:			
Project Officer Name Meghan Hessenauer							Branch/Mail Code:			
_____ (Signature) (Date)							Phone Number: 202-566-1040			
							FAX Number:			
Other Agency Official Name							Branch/Mail Code:			
_____ (Signature) (Date)							Phone Number:			
							FAX Number:			
Contracting Official Name Brad Heath							Branch/Mail Code:			
_____ (Signature) (Date)							Phone Number: 513-487-2352			
							FAX Number:			

**Performance Work Statement
Contract EP-C-12-021
Work Assignment 3-30**

Title: Technical Support for EPAs Response to the Industry Petition on ELGs for Non-Remote Alaskan Seafood Processors

Work Assignment Contracting

Officer's Representative (WACOR): Meghan Hessenauer

Alternate Work Assignment Contracting

Officer's Representative (Alternate WACOR): Wendy Hoffman

Period of Performance (POP): September 26, 2015 through September 25, 2016

New Contracting Terminology From Environmental Protection Agency Acquisition Guide (EPAAG) Subsection 1.6.5
Contract-Level Contracting Officer's Representative (CL-COR) = Project Officer (PO)
Alternate Contract-Level Contracting Officer's Representative (Alternate CL-COR) = Alternate Project Officer (APO)
Work Assignment Contracting Officer's Representative (WACOR) = Work Assignment Manager (WACOR)
Alternate Work Assignment Contracting Officer's Representative (Alternate WACOR) = Alternate Work Assignment Manager (AWAM)

Purpose: The purpose of this work assignment is to outline the tasks for the contractor in adherence with the Performance Work Statement of Contract EP-C-12-021. Specifically, the contractor shall provide technical support to the Office of Water, Engineering and Analysis Division, Alaskan Seafood Project Team in the development of responses to comments from the Notice of Data Availability (NODA) and to support the final rulemaking efforts.

Background: Under the Clean Water Act (CWA), EPA establishes national technology-based regulations, known as "effluent limitations guidelines and standards," to reduce discharges of pollutants from industries to waters of the U.S. In the 1970s, EPA issued an effluent limitation guideline (ELG) establishing limits for seafood processing facilities in Alaska based upon location. The ELGs differentiated between non-remote seafood processing locations and remote seafood processing locations. In "non-remote" locations, the ELGs are based on the screening of the processing solids from the seafood processing wastewaters and disposing of the solids by means other than discharge to navigable waters. In "remote" locations, the ELGs are based on grinding of the processing solids to reduce the size of the waste pieces to no greater than ½ inch, which could then be discharged into the navigable waters as a part of the facility's effluent. In 1980, EPA temporarily suspended the limits for non-remote regions of Alaska based on a petition from the seafood processing industry to allow EPA to consider new information. During the suspension EPA applied the remote limits based on grinding. In 1981, EPA issued a draft response, proposing to deny most of the petition and requested public comments on that

response. EPA also indicated it would continue the suspension until a petition final response was issued. To date, EPA has not issued a final response.

After years of focus on other CWA discharge priorities, in 2010 EPA began the process leading to a final decision on a response to the petition. As a result, EPA recently gathered new data and information and performed supporting analyses to update the 1981 proposal. The recent data demonstrates a significant impact associated with near shore discharges of seafood waste where EPA has suspended the “non-remote” requirements. The primary concern with near shore discharges of seafood processing waste is the formation and persistence of waste piles at the bottom of receiving waters. Near shore piles of fish processing waste cover large areas of the seafloor and contain large quantities of solids that negatively affect receiving water quality. These piles range in area from less than an acre up to tens of acres, and from relatively thin coverage of the bottom up to many feet thick. The waste piles smother benthic communities, deplete dissolved oxygen, and cause other harmful impacts on the aquatic ecosystem. In some cases, large waste piles do not dissipate, even with flushing from tides and strong channel currents. Where discharges have stopped, fish waste piles and their effects can remain for 10 years or more.

As a result of this new information, EPA provided preliminary results of analyses of the updated data and information in the Notice of Data Availability (NODA) dated November 2013. The comment period closed on March 7, 2014. EPA provided preliminary indications of how these results may be reflected in EPA’s final response to petitions submitted in 1980 by certain members of the Alaskan seafood processing industry. In addition to the final response to the petition, EPA will respond to all comments. EPA may promulgate in final form amended ELGs applicable to certain Alaskan seafood processing discharges.

General Work Assignment Requirement:

Deliverable Formatting and Terminology

Throughout this Work Assignment, the contractor shall provide draft and final reports to EPA in electronic and hard copy formats. The WACOR and contractor will use the terminology in this work assignment to improve the deliverable review process. The contractor shall discuss the computer file formats to be used for word processing, spreadsheet, database and graphics with the WACOR prior to file preparation. The WACOR will identify for the contractor which documents will be posted on EPA’s Effluent Guidelines webpage. The documents posted to the Effluent Guidelines webpage will need to be Section 508 compliant. For planning purposes, the contractor should assume that a Response to Comments document may be posted to the webpage.

Travel

Non-local travel by the contractor employees and/or subcontractors may be required to support the scope of this work assignment. The contractor shall provide specific travel details and costs in a request for travel approval by the WACOR and the Contract-Level COR (CL-COR) before each trip occurs (as specified by the contract per clause H.32).

Confidential Business Information

The contractor will, at all times, adhere to Confidential Business Information (CBI) procedures when handling industry information. The contractor will manage all reports, documents, and other materials and all draft documents developed under this work assignment in accordance with the procedures set forth in its "Office of Science & Technology Confidential Business Information (OST-CBI) Application Security Plan," dated December 5, 2007 or its successor approved plans.

Identification as Contracting Staff

To avoid the perception that contractor personnel are EPA employees, contractor personnel shall be clearly identified as independent contractors of EPA when participating in events with outside parties and visiting field sites. When speaking with the public, the contractor should refer all interpretations of policy to the WACOR.

Limitation of Contractor Activities

The contractor shall submit drafts of all deliverables to the WACOR for review prior to submission of the final product. The contractor shall incorporate all WACOR comments into all final deliverables, unless otherwise agreed upon by the WACOR. The contractor shall adhere to all applicable EPA management control procedures as implemented by the Contracting Officer (CO), CL-COR and WACOR.

Deliverables

Major technical reports shall be subject to internal contractor peer review by an expert(s) not directly involved in the mainstream Work Assignment tasks. Deliverables will be prepared with proper adherence to EPA style and format requirements.

Deadlines

For the purpose of developing the work plan, the contractor shall assume the deliverable due dates provided with each task. Most of the deadlines are associated with Agency milestones which are subject to change. Any changes in schedule tend to result in extensions, rather than shorter schedules. In either case, if the schedule changes then the CL-COR or WACOR will change the deliverable deadlines through written technical direction. The CL-COR or WACOR also will use written technical direction to change a deadline if management requires any particular deliverable earlier than specified in the following tasks. For any deliverable, no deadline will extend beyond the WA period of performance.

Conferences, Meetings and Other Events

No single event under this Work Assignment is anticipated to exceed \$20,000. The Contractor shall immediately notify the CO, CL-COR and WACOR of any anticipated event involving support for a meeting, conference, workshop, symposium, retreat, seminar or training that may potentially incur \$20,000 or more in cost during performance. Conference expenses are all direct and indirect costs paid by the government and include any associated authorized travel and per diem expenses, room charges for official business, audiovisual use, light refreshments, registration fees, ground transportation and other expenses as defined by the Federal Travel Regulations. All outlays for conference preparation should be included, but the federal employee time for conference preparation should not be included. After notifying EPA of the

potential to reach this threshold, the Contractor shall not proceed with the task(s) until authorized to do so by the CO.

Tasks (PWS Section 3.0 and 4.0):

1) Management of the Work Assignment

The contractor shall develop a work plan describing the necessary steps and estimated hours to complete each of the tasks included in this work assignment. The work plan shall also include a list of the key personnel to participate in the work assignment. The contractor shall also estimate direct costs such as travel, computer costs, typing, etc. The workplan is due in accordance with contract requirements.

The contractor shall provide electronic copies of a monthly progress reports to the CO, CL-COR and WACOR. Each progress report shall describe the work and expenditures for the same time period as the corresponding invoice. The reports shall list by task the amount of work completed and include a table of hours by personnel for each task. The reports also shall identify any problems or difficulties. Finally, the monthly report should include a discussion of quality assurance progress.

2) Quality Assurance

EPA policy requires that an approved Quality Assurance Project Plan (QAPP) be in place before any work begins that involves the collection, generation, evaluation, analysis or use of environmental data. This work assignment is a continuation of work previously performed by contractor under WAs 30. A revised draft QAPP was prepared to support this project and is in Attachment A and Appendices. A final QAPP shall be prepared by the Contractor prior to use of new data. The Contractor shall assume a final QAPP will be prepared.

3) Comment Support

The contractor shall provide technical support to EPA's efforts to respond to public comments received on the NODA and 1981 proposed rule. The contractor shall update the draft final comment response document prepared in the previous WA. This support may include, but is not limited to, the following activities: compiling information that will be used to develop responses to comments; and drafting responses. Responses may consist of individual comment responses, or they may be in the form of essays that address major issues or frequently stated comments. The contractor shall provide monthly reports regarding the status of comment response activities, including summary statistics for the number of comments for which responses have been drafted (or not drafted) and the review/approval status of the responses.

4) Analyses Support

The contractor shall provide a draft final costing analysis report to the WACOR upon technical direction. Analyses may include updating the memos used for the costing model. For planning purposes, the contractor shall assume there will be no more than three revisions to the draft costing analysis.

5) Technical Support

The contractor shall provide technical support to the WACOR for outreach activities with stakeholders to clarify comments if needed. In addition, the contractor shall provide technical support in reviewing the 2015 site visit reports. The contractor shall also prepare a draft summary of the site visit reports. The WACOR will provide written technical direction for all technical support.

6) Record Index and Docket Support

The contractor shall maintain and complete an accurate and detailed record index that documents all data collected and analyses performed to support this project. Both a non-CBI version, appropriate for submission to the EPA docket and, if necessary, a CBI record containing a complete set of CBI will continued to be maintained. The contractor shall regularly update the index listing all CBI and non-CBI materials gathered and submitted for inclusion in the record. The index itself is to be non-CBI and will be transferred to the docket as directed by the WACOR. The contractor shall also assemble non-CBI record information which can be transferred to the docket when necessary as directed by the WACOR. All records must be submitted to the WACOR by the end of the period of performance – September 25, 2016.

7) Regulatory Support

Upon written technical, the contractor shall assist EPA in developing and analyzing regulatory options and its implementation, based on comments on the 2013 NODA and 1981 Proposed Rule. Technical support under this task shall include preparing text for use in the response to the petition, Federal Register preamble, providing technical assistance in developing final language for the regulation. Tasks may also include providing supporting information and documentation for regulatory option packages, briefings, and selected analyses and data summaries. Deliverables under this task may include quick-response tasks.

Deliverables:

Task	Deliverable	Deadline
1	Workplan	In accordance with contract requirements
1	Monthly Progress Reports	Monthly
2	Revised QAPP	Due before new data can be used
3	Comment Response Support	Ongoing
4	Analyses Support	Via Technical Direction
5	Technical Support	Via Technical Direction
6	Record Index	Ongoing
6	Docket Support	Ongoing
7	Regulatory Support	Via Technical Direction

EPA United States Environmental Protection Agency Washington, DC 20460 Work Assignment						Work Assignment Number 3-30				
						<input type="checkbox"/> Other <input type="checkbox"/> Amendment Number:				
Contract Number EP-C-12-021			Contract Period 09/26/2012 To 09/25/2016 Base Option Period Number 3			Title of Work Assignment/SF Site Name AK Seafood ELG				
Contractor EASTERN RESEARCH GROUP, INC.					Specify Section and paragraph of Contract SOW 4.0					
Purpose: <input checked="" type="checkbox"/> Work Assignment <input type="checkbox"/> Work Assignment Close-Out <input type="checkbox"/> Work Assignment Amendment <input type="checkbox"/> Incremental Funding <input checked="" type="checkbox"/> Work Plan Approval						Period of Performance From 09/26/2015 To 09/25/2016				
Comments:										
<div style="display: flex; justify-content: space-between;"> <input type="checkbox"/> Superfund Accounting and Appropriations Data <input checked="" type="checkbox"/> Non-Superfund </div>										
Note: To report additional accounting and appropriations data use EPA Form 1900-69A.										
SFO (Max 2) <input type="checkbox"/>										
Line	DCN (Max 6)	Budget/FY (Max 4)	Appropriation Code (Max 6)	Budget Org/Code (Max 7)	Program Element (Max 9)	Object Class (Max 4)	Amount (Dollars)	(Cents)	Site/Project (Max 8)	Cost Org/Code (Max 7)
1										
2										
3										
4										
5										
Authorized Work Assignment Ceiling										
Contract Period:		Cost/Fee: \$0.00		LOE: 0						
09/26/2012 To 09/25/2016										
This Action:		\$89,517.00		915						
Total:		\$89,517.00		915						
Work Plan / Cost Estimate Approvals										
Contractor WP Dated: 10/15/2015		Cost/Fee: \$89,517.00		LOE: 915						
Cumulative Approved:		Cost/Fee: \$89,517.00		LOE: 915						
Work Assignment Manager Name Meghan Hessenauer <div style="display: flex; justify-content: space-between;"> <div>_____ (Signature)</div> <div>_____ (Date)</div> </div>						Branch/Mail Code: Phone Number 202-566-1040 FAX Number:				
Project Officer Name Meghan Hessenauer <div style="display: flex; justify-content: space-between;"> <div>_____ (Signature)</div> <div>_____ (Date)</div> </div>						Branch/Mail Code: Phone Number: 202-566-1040 FAX Number:				
Other Agency Official Name <div style="display: flex; justify-content: space-between;"> <div>_____ (Signature)</div> <div>_____ (Date)</div> </div>						Branch/Mail Code: Phone Number: FAX Number:				
Contracting Official Name Brad Heath <div style="display: flex; justify-content: space-between;"> <div>_____ (Signature)</div> <div>_____ (Date)</div> </div>						Branch/Mail Code: Phone Number: 513-487-2352 FAX Number:				

EPA United States Environmental Protection Agency Washington, DC 20460 Work Assignment						Work Assignment Number 3-30				
						<input type="checkbox"/> Other <input checked="" type="checkbox"/> Amendment Number: 000001				
Contract Number EP-C-12-021			Contract Period 09/26/2012 To 09/25/2016 Base Option Period Number 3			Title of Work Assignment/SF Site Name AK Seafood ELG				
Contractor EASTERN RESEARCH GROUP, INC.					Specify Section and paragraph of Contract SOW N/A					
Purpose: <input type="checkbox"/> Work Assignment <input type="checkbox"/> Work Assignment Close-Out <input checked="" type="checkbox"/> Work Assignment Amendment <input type="checkbox"/> Incremental Funding <input type="checkbox"/> Work Plan Approval						Period of Performance From 05/19/2016 To 09/25/2016				
Comments:										
<input type="checkbox"/> Superfund Accounting and Appropriations Data <input checked="" type="checkbox"/> Non-Superfund										
Note: To report additional accounting and appropriations data use EPA Form 1900-69A.										
SFO <input type="checkbox"/> (Max 2)										
Line	DCN (Max 6)	Budget/FY (Max 4)	Appropriation Code (Max 6)	Budget Org/Code (Max 7)	Program Element (Max 9)	Object Class (Max 4)	Amount (Dollars)	(Cents)	Site/Project (Max 8)	Cost Org/Code
1										
2										
3										
4										
5										
Authorized Work Assignment Ceiling										
Contract Period:		Cost/Fee:				LOE:				
09/26/2012 To 09/25/2016										
This Action:										
Total:										
Work Plan / Cost Estimate Approvals										
Contractor WP Dated:					Cost/Fee			LOE:		
Cumulative Approved:					Cost/Fee			LOE:		
Work Assignment Manager Name Lindsay Guzzo							Branch/Mail Code:			
_____ (Signature) (Date)							Phone Number: 206-553-0268			
							FAX Number:			
Project Officer Name Meghan Hessenauer							Branch/Mail Code:			
_____ (Signature) (Date)							Phone Number: 202-566-1040			
							FAX Number:			
Other Agency Official Name							Branch/Mail Code:			
_____ (Signature) (Date)							Phone Number:			
							FAX Number:			
Contracting Official Name Brad Heath							Branch/Mail Code:			
_____ (Signature) (Date)							Phone Number: 513-487-2352			
							FAX Number:			

Performance Work Statement
Contract EP-C-12-021
Work Assignment 3-30
Amendment 1

Title: Technical Support for EPAs Response to the Industry Petition on ELGs for Non-Remote Alaskan Seafood Processors

Work Assignment Contracting

Officer's Representative (WACOR): Lindsay Guzzo

Alternate Work Assignment Contracting

Officer's Representative (Alternate WACOR): Meghan Hessenauer

Period of Performance (POP): May 19, 2016 through September 25, 2016

Purpose: The purpose of this work assignment amendment is to add hours to specific tasks to complete the rulemaking effort. In addition, Lindsay Guzzo will be the WACOR and Meghan Hessenauer will be the alternate WACOR.

Additional Hours to Tasks (PWS Section 3.0 and 4.0):

- 1) Management of the Work Assignment
- 2) Quality Assurance
Incorporate EPA comments into QAPP.
- 3) Comment Support
Divide comments and responses into sections.
Draft responses for comments in a word file for EPA to review.
- 4) Analyses Support
Conduct additional costing analyses for inland waters.
Add additional facility in Anchorage.
Complete a timeline of by-product recovery usage or alternative waste management options. Add loading removals and non-water quality impacts to cost report.
Incorporate EPA comments into costing report.
Complete Site Visit Reports.
- 5) Technical Support
- 6) Record Index and Docket Support
Incorporate tribal summaries and memos to the record into the docket.
Add annual reports to the docket.

All records must be submitted to the WACOR by the end of the period of performance – September 25, 2016.

7) Regulatory Support

Deliverables:

Task	Deliverable	Deadline
1	Workplan	In accordance with contract requirements
1	Monthly Progress Reports	Monthly
2	Revised QAPP	Due before new data can be used
3	Comment Response Support	June 2016
4	Analyses Support	Via Technical Direction
5	Technical Support	Via Technical Direction
6	Record Index	By September 25, 1016
6	Docket Support	Ongoing
7	Regulatory Support	Via Technical Direction

EPA United States Environmental Protection Agency Washington, DC 20460 Work Assignment						Work Assignment Number 3-30				
						<input type="checkbox"/> Other <input checked="" type="checkbox"/> Amendment Number: 000001				
Contract Number EP-C-12-021			Contract Period 09/26/2012 To 09/25/2016 Base Option Period Number 3			Title of Work Assignment/SF Site Name AK Seafood ELG				
Contractor EASTERN RESEARCH GROUP, INC.					Specify Section and paragraph of Contract SOW See PWS					
Purpose: <input type="checkbox"/> Work Assignment <input type="checkbox"/> Work Assignment Close-Out <input checked="" type="checkbox"/> Work Assignment Amendment <input type="checkbox"/> Incremental Funding <input checked="" type="checkbox"/> Work Plan Approval					Period of Performance From 05/19/2016 To 09/25/2016					
Comments: This Work Plan Approval incorporates Amendment 1.										
<input type="checkbox"/> Superfund Accounting and Appropriations Data <input checked="" type="checkbox"/> Non-Superfund										
SFO <input type="checkbox"/> Note: To report additional accounting and appropriations date use EPA Form 1900-69A. (Max 2)										
Line	DCN (Max 6)	Budget/FY (Max 4)	Appropriation Code (Max 6)	Budget Org/Code (Max 7)	Program Element (Max 9)	Object Class (Max 4)	Amount (Dollars)	(Cents)	Site/Project (Max 8)	Cost Org/Code
1										
2										
3										
4										
5										
Authorized Work Assignment Ceiling										
Contract Period:		Cost/Fee: \$89,517.00		LOE: 915						
09/26/2012 To 09/25/2016										
This Action:		\$48,084.00		515						
Total:		\$137,601.00		1,430						
Work Plan / Cost Estimate Approvals										
Contractor WP Dated: 06/13/2016		Cost/Fee \$48,084.00		LOE: 515						
Cumulative Approved:		Cost/Fee \$137,601.00		LOE: 1,430						
Work Assignment Manager Name Lindsay Guzzo <div style="display: flex; justify-content: space-between;"> <div>_____ (Signature)</div> <div>_____ (Date)</div> </div>						Branch/Mail Code:				
						Phone Number: 206-553-0268				
						FAX Number:				
Project Officer Name Meghan Hessenauer <div style="display: flex; justify-content: space-between;"> <div>_____ (Signature)</div> <div>_____ (Date)</div> </div>						Branch/Mail Code:				
						Phone Number: 202-566-1040				
						FAX Number:				
Other Agency Official Name <div style="display: flex; justify-content: space-between;"> <div>_____ (Signature)</div> <div>_____ (Date)</div> </div>						Branch/Mail Code:				
						Phone Number:				
						FAX Number:				
Contracting Official Name Brad Heath <div style="display: flex; justify-content: space-between;"> <div>_____ (Signature)</div> <div>_____ (Date)</div> </div>						Branch/Mail Code:				
						Phone Number: 513-487-2352				
						FAX Number:				